

EXHIBIT 6

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF MICHIGAN

JOHN PLAINTIFF,

Plaintiff,

vs.

Case No. 2:20-cv-11718-GAD-DRG

WAYNE STATE UNIVERSITY, WAYNE
STATE UNIVERSITY SCHOOL OF
MEDICINE, NICOLINA CAMAJ, MARGIT
CHADWELL, MATTHEW JACKSON,
RICHARD S. BAKER, R. DARIN ELLIS,
in their individual and official
capacities, jointly and severally,
Defendants.

The Remote Zoom Videoconference Deposition of
NICOLINA CAMAJ,
Taken at 280 North Old Woodward Avenue,
Birmingham, Michigan,
Commencing at 10:04 a.m.,
Wednesday, October 6, 2021,
Before Leisa M. Pastor, CSR-3500, RPR, CRR.

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6 **vs.**

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CAMAJ, NICOLINA 10/06/2021

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1 Birmingham, Michigan

2 Wednesday, October 6, 2021

3 10:04 a.m.

4
5 NICOLINA CAMAJ,

6 was thereupon called as a witness herein, and after
7 having first been duly sworn to testify to the truth,
8 the whole truth and nothing but the truth, was
9 examined and testified as follows:

10 EXAMINATION

11 BY MR. FLORES:

12 Q. Good morning, Ms. Camaj.

13 A. Good morning.

14 Q. I'm sure Mr. Porter has told you my name is Bob
15 Flores. I am Mr. Eid's attorney, and I'm going to be
16 doing this deposition today.

17 I'd like to try to keep this as a -- kind
18 of a conversation. There may be times that I ask a
19 question that's confusing. Rather than try to answer
20 it, if you would just kind of stop me and just let me
21 know that it's confusing, that would be great. I know
22 that sometimes we can end up talking over each other,
23 so I will do my best to try to wait until you've
24 finished your answer before I start talking.
25 Otherwise, that will probably create some problems

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1 with Zoom.

2 Just to have an idea as to -- with your
3 familiarity to these kinds of issues in this kind of a
4 situation, have you ever testified as a witness in a
5 trial prior to your testimony today?

6 A. No.

7 Q. And have you ever given any kind of testimony under
8 oath?

9 A. No.

10 Q. Have you ever been a party to a lawsuit?

11 A. No.

12 Q. And just in terms of how I'd like to conduct this and,
13 obviously, you know, your lawyer's going to have his
14 own thoughts about what his role is, but generally
15 speaking, the purpose for the deposition is to get as
16 much information as possible so we could narrow the
17 issues if and when we go to trial.

18 To that end, you have to answer all the
19 questions I ask, although they may be objectionable
20 from your attorney's perspective, and they may object,
21 they'll object. They'll state their reason for the
22 objection, but for purposes of the deposition, you'll
23 then answer the question unless it's a matter of
24 privilege, and then the lawyers will kind of work that
25 out as quickly as possible to get back to your

1 deposition, but it's not like a courtroom where you
2 actually have, like, a judge making a final ruling
3 where a judge would say that's, you know, I'm going to
4 exclude that or I'm not going to allow that question
5 or rephrase it. We're not kind of in that situation
6 today because we don't have a neutral arbitrator like
7 a judge or a magistrate.

8 If you need to take a break, sometimes I
9 end up getting so involved in the deposition answering
10 questions I forget about what time it is, just let me
11 know. I think I'm going to try to take a break at
12 least once every 45 minutes to an hour for about five
13 minutes just to give people a break in case they've
14 got to make a call or they've got to take care of some
15 other things.

16 Obviously, any exhibits that you will need
17 in order to be able to answer a question need to be
18 provided by me. So just to ask right now, you don't
19 have any documents in front of you or any other
20 material that you've been given either by counsel or
21 that you've prepared that are with you right now; is
22 that right?

23 A. Right, I don't have anything in front of me.

24 Q. Great. If during the time that I'm asking you
25 questions there is a document that you know of that

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1 would refresh your recollection, I may very well be
2 getting to it later on in the deposition, but just let
3 me know, and then we'll try to figure out if I don't
4 have it if we can get it and that will help you
5 refresh your recollection because, obviously, we want
6 you to testify today from your current recollection.
7 So there may be things that you just don't remember
8 because time has passed.

9 Most of these questions are going to
10 involve my asking you about whether you've met with
11 your lawyers or done things like that. I want to be
12 very clear at any time during the deposition, I am not
13 asking you about what you told your attorneys or what
14 your attorneys told you. I'm just trying to get a
15 sense for time and space of when you may have started
16 to prepare and those kinds of things.

17 So is it fair to say that you had at least
18 one meeting with your lawyers or a member of your
19 lawyer's firm in preparing for your deposition today?

20 A. Yes.

21 Q. And did you spend a significant amount of time with
22 them, or was it just kind of in passing?

23 MR. PORTER: Objection, form.

24 BY MR. FLORES:

25 Q. You can go ahead and answer if you can.

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1 A. I don't know what "significant time" means but...

2 Q. Did you spend a couple hours with them --

3 A. Yes.

4 Q. -- or was it just a few --

5 A. A few hours, yes.

6 Q. I apologize for that; let me ask the question again.

7 Did you spend several hours with your attorneys
8 preparing for the deposition?

9 A. I don't know that I would define several hours but a
10 few hours, yes.

11 Q. And where did that take place?

12 A. Virtually.

13 Q. And did you prepare any documents as part of your
14 preparation for the deposition?

15 A. Not during the conversation with my attorney, no.

16 Q. Did you take any notes or make any writings as part of
17 your preparation for the deposition?

18 A. Yes, I reread the investigation report I submitted
19 just to refresh my memory of what it said so that --
20 because it had happened so many years ago.

21 Q. Okay. Did you take any notes as you made that review?

22 A. No. I just read the document.

23 Q. And I already asked you about documents that you may
24 have with you. Your testimony is there's nothing in
25 front of you as you testified this morning?

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1 A. No, there's nothing in front of me other than a
2 computer screen.

3 Q. Now, we submitted several requests for documents to
4 your attorneys, and they provided a host of documents
5 in return. I'd like to know whether or not you
6 participated in searching for or producing those
7 documents?

8 A. I'm not sure I know what you're referring to in terms
9 of documents.

10 Q. I'm sorry, I cut you off.

11 A. That's okay, I'm just not sure in terms of what
12 documents I would have sent other than my report with
13 the included evidence that was submitted. I didn't
14 have any other additional documents.

15 Q. All right. So you did not provide any additional
16 documents beyond your report to your attorneys?

17 A. Right, anything that was related to my submitting the
18 report, that's what I submitted. To the best of my
19 recollection, I don't -- yeah, yeah.

20 Q. Other than your attorneys, did you receive help from
21 anyone else in preparing for your deposition?

22 A. No.

23 Q. Did you discuss your deposition with anyone other than
24 your lawyers?

25 A. No.

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1 Q. Did you speak to anybody in the general counsel's
2 office in preparation for your deposition?

3 A. Well, our general counsel is here, Kristen, and so she
4 was present, yeah.

5 Q. I'm sorry?

6 A. She was present when the lawyer was speaking to me.

7 Q. Okay.

8 A. So I didn't have additional meetings.

9 Q. All right. Do you keep a personal calendar or a
10 journal that has your daily activities in it?

11 MR. PORTER: Objection, form.

12 BY MR. FLORES:

13 Q. Do you keep a daily journal?

14 A. No, I don't have a journal, and I have a work calendar
15 but not a personal calendar.

16 Q. Where do you -- how do you keep that work calendar?

17 A. It's Outlook. I do my best to keep it updated. It's
18 not always accurate but I do my best.

19 Q. Okay. Thank you. Do you have a secretary that works
20 for you?

21 A. Not a personal secretary, no.

22 Q. Administrative assistant?

23 A. I don't -- under me, I don't have anybody that works
24 for me in my line of work.

25 Q. And do you work exclusively in the office or do you

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1 work from home?

2 A. I work in the office; however, during the pandemic, I
3 was working remotely, and currently, I'm doing one day
4 remote and four days in the office.

5 Q. And do you remember when you -- approximately when you
6 started working from home?

7 A. Sure. It was, I think, March -- it probably was
8 March 13th was our last day. That's when we were sent
9 home. I feel like the 13th is the correct answer, in
10 March.

11 Q. And does the university provide you with a work cell
12 phone?

13 A. No.

14 Q. So the only communications device that you have is
15 your personal phone?

16 A. Right. Yes.

17 Q. Can I have that telephone number, please?

18 MR. PORTER: Objection. Why are you -- why
19 do you need her personal information?

20 MR. FLORES: I don't need to provide you
21 with that information. You have your objection. It's
22 not privileged.

23 A. I can -- would it be appropriate for me to give you my
24 office phone number since they're both linked
25 together?

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1 BY MR. FLORES:

2 Q. No, I'd like to have your cell phone number.

3 A. Okay. (586) 214-8250.

4 Q. And you have a desk phone, as well?

5 A. Yep.

6 Q. And what is the telephone number for that line?

7 A. It's (313) 577-8063.

8 Q. Let me just read that last number back to you:

9 (313) 577-8063?

10 A. Yes.

11 Q. And have you had -- approximately how long have you
12 had the cell phone number?

13 A. I think I had it since 2013, end of 2013.

14 Q. And have you had the same desk line since you started
15 working at Wayne State?

16 A. Yes, it was assigned to me, yep.

17 Q. Do you have any other telephone numbers that you may
18 use for work or receive work phone calls on?

19 A. Not me personally, no. I have one phone number.

20 Q. Can you tell me when -- what degrees you hold?

21 A. Sure, I have a Bachelor's of Science in Secondary
22 Education from Central Michigan University with a
23 specialization in secondary education in mathematics
24 and geography, and I have a degree from Clemson
25 University in the -- excuse me, Masters of Counselor

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1 Education with a specialty in student affairs and
2 administration.

3 Q. And in addition to those -- I'm sorry, can you tell me
4 when you obtained those degrees?

5 A. Sure, Central Michigan I obtained a degree in August
6 of 2001. In Clemson, I obtained a degree in May of
7 2003.

8 Q. You don't hold any other degrees or certificates?

9 A. No.

10 Q. So am I correct in understanding that you -- well, let
11 me -- let me withdraw that. Do you have any training
12 in police administration?

13 A. I'm not familiar what that means, police
14 administration. I'm not sure I understand the
15 question.

16 Q. Have you received any training as part of your
17 master's degree in the operation of police
18 departments, police -- proper police administration,
19 investigation of school matters, anything like that?

20 MR. PORTER: Objection, form.

21 A. Since I was a resident assistant, I've been working
22 closely with police in my job when I've been serving
23 as an oncall professional staff member for 20-plus
24 years, so from being a resident assistant to hall
25 director, community director, assistant director, I've

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1 served in a role where I am working with police in
2 terms of responding to student needs in, you know,
3 when I'm on call.

4 Q. Have you taken any criminal justice courses?

5 A. I have not.

6 Q. Have you taken any courses in computer forensics?

7 A. I have not.

8 Q. Do you know, have you trained yourself or have you
9 learned how to conduct basic computer forensic exams?

10 A. I have not.

11 Q. You're not a licensed private investigator?

12 A. I do not have a license to be a private investigator,
13 no.

14 Q. And do you have any training with respect to the
15 investigation of civil rights cases?

16 A. No, that's not -- no.

17 Q. Could you expand a little bit and tell me a little bit
18 more about your master's degree?

19 A. In terms of?

20 Q. What had prepared you for the kinds of courses that
21 you took just to get a better idea as to exactly what
22 that degree is about since I'm not familiar with it?

23 A. Sure. So when you study in the field of student
24 affairs in higher education, you could have many
25 specialties, and in my case, my specialty was working

1 within residential life but also being exposed to
2 other specialties like conduct and orientation and
3 admissions. So there are several different
4 departments that are campus services, and you really
5 focused on student development and how you can help a
6 student progress in the -- in their -- you know, when
7 they're seeking a degree.

8 And so with my degree while I was getting
9 my master's, I had to work full time as a hall
10 director. So that's part of the experience is that
11 you're gaining on-the-spot experience and knowledge
12 along with a degree, and in -- in Clemson, I began
13 severing as a conduct officer, what we called a
14 hearing officer. So I would follow up with students
15 when violations -- alleged violations would take
16 place, and I would make decisions on cases.

17 So since then, I have been serving in some
18 type of role as a hearing officer more broadly
19 speaking. In other places, I've been called a conduct
20 officer, so different titles, but you're still doing
21 student conduct in every single place I've worked. So
22 that's 20-plus years of conduct experience.

23 Q. All right. Thank you very much. That's very helpful.

24 A. You're welcome.

25 Q. After you graduated from Clemson, did you stay there

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1 for a while as an employee or did you go to -- did you
2 have -- did you find other work?

3 A. I found other work.

4 Q. Where did you -- where were you employed?

5 A. Six months later, I received a position in Southern
6 Illinois University - Carbondale.

7 Q. And what was the position?

8 A. Sure, I served as a hall director for an 800-person
9 building consisting of freshman where I also had
10 probably 10 to 20 conduct cases a week I had to follow
11 up with, and I served --

12 (Attorney and witness speak over each
13 other.)

14 A. Yeah, and I served in an on-call capacity too, so both
15 administrative responsibilities, oncall
16 responsibilities, and hearing officer
17 responsibilities, and I did that for a year and a half
18 there.

19 Q. So during that employment, you were pretty much a
20 one-person band?

21 A. No, we have a team we work with. So when you're --
22 when you're on call, you're not the only person on
23 call, but when you do get assigned your conduct cases
24 for your building, you're the one making the
25 decisions.

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1 Q. What was the scope of your authority in terms of
2 decision making when you were dealing with a conduct
3 case?

4 A. Sure, I was able to determine if a student was
5 responsible/not responsible or the case had no further
6 action due to a lack of evidence, and if a student was
7 found responsible, I was able to determine sanctions.

8 Q. And were those decisions all subject to review by
9 whoever was your boss, or were they left at your
10 level?

11 A. Yeah, of course I have a supervisor, and so they would
12 monitor us as a professional. They evaluate you to
13 make sure they're following your policies and
14 expectations according to whichever university you're
15 at, you want to make sure you're following their
16 policies.

17 Q. And how long, again, did you hold that position?

18 A. That was for about a year and a half.

19 Q. And what was the reason you left?

20 A. I got a position in New York City.

21 Q. What was that?

22 A. Again, I served as a hall director on an urban campus.
23 So the reason for my move is to move to the East
24 Coast, and again, I served in a similar role, hall
25 director, had the similar responsibility; however, it

1 was in a large setting, so it was a large urban
2 environment compared to a rural environment, so I just
3 wanted to more experience, and that was the reason for
4 my move, but similar experience.

5 Q. And what was the school?

6 A. It was called The New School.

7 Q. Oh, okay.

8 A. That's where they had the Parsons School of Design and
9 the Actors Studio at the time.

10 Q. Yeah, I was a district attorney in New York, so I'm
11 familiar with definitely a different type of student
12 that attends that school.

13 And how long did you stay The New School?

14 A. Sure. I stayed there for a year, and then I got a
15 higher paying position with the Fashion Institute of
16 Technology a couple blocks down where I served --
17 they're -- called us resident counselors, but we
18 served as hall directors. It's just we have a lot of
19 different titles in our field, so a resident counselor
20 at FIT served the same role as what a hall director
21 would be called, and again, I supervised two buildings
22 over there in Chelsea, and I had similar
23 responsibilities meeting with students for conduct
24 matters, being on call in the city, and severing in a
25 similar fashion.

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1 Q. And how long did you stay at FIT?

2 A. I stayed there for a year before I got recruited to
3 work for Blackstone in their Blackstone property
4 management sector in London, England.

5 Q. Now that's kind of a very different change. How long
6 was that, and where were you in London?

7 A. Yeah, Blackstone Property Management was investing in
8 luxury residence halls and their relationships with
9 university students that would be living in London and
10 studying, and so they built these residence halls, and
11 some of our clientele was coming from America, so they
12 needed somebody with experience that I had because
13 they didn't have that in London, so they recruited me
14 to work there as their residence manager, and I had a
15 supervisor who managed the whole -- the two complexes,
16 and it involved having a cafeteria onsite, laundry
17 room onsite, it was just a huge complex, and so I was
18 responsible for residential life experience of several
19 thousand students, and I also served in a capacity
20 where I was a hearing officer and would follow up with
21 students for conduct matters.

22 And then my second year there, I became the
23 residence manager, so I was promoted, and so for the
24 last two years, I was there serving in a higher role
25 where I was responsible for students from 80 different

1 countries and -- and again, severing in a conduct
2 hearing capacity, as well.

3 Q. And was that complex connected to a particular
4 university?

5 A. No, we worked with several universities, both
6 internationally and locally, so you know, the
7 University College of London is one, for example,
8 King's College, so several of the London universities
9 but also places like New York University and other
10 institutions like University of North Carolina that
11 would come stay in our residence hall, so we would
12 develop relationships with universities so their
13 students could stay in our building.

14 Q. So, basically, Blackstone was commodifying the student
15 hall kind of opportunity so schools didn't have to
16 spend the money to build something --

17 A. Right. Right. They could stay with us.

18 Q. Great. And after Blackstone, when did you come back
19 to the -- or did you take another posting in Europe?

20 A. I came back to the United States, I think it was 2010,
21 and then I took some time off before I started at
22 Brown University in Providence, Rhode Island, and I
23 was there for a year severing as a community director.
24 Again, I was supervising their themed housing that
25 involved Greek live students and other themed housing,

1 again, severing in a capacity of being oncall and
2 being a hearing officer.

3 Q. And the community director, that was, again, kind of
4 the same type of position --

5 A. Yeah, you just -- you just have more buildings, yeah,
6 you just have several more buildings on campus that
7 you're in charge of.

8 Q. And during what period were you at Brown? What years?

9 A. I think it was 2012-2013. I lost my father, I
10 think -- I think it was the end of 2013, so I ended up
11 staying in America for a year to be with my family, so
12 I didn't work at all so I could help my family, and
13 that's when I was job searching, and after my Brown
14 University experience, I stayed home for about a year,
15 a year and a half, and then I started searching again,
16 and I found myself working and got recruited to work
17 at New Orleans University of -- Loyola University of
18 New Orleans in Louisiana, and I was there for three
19 years severing as the assistant director for
20 residential life -- assistant director for -- they
21 gave me a really long title, but my main purpose was
22 to be in charge of the conduct system there and to be
23 trained as a Maxient software administrator that would
24 receive all reports and manage the community
25 director's experience as conduct hearing officers, so

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1 I had a higher level role there as a conduct officer
2 for the campus.

3 Q. So let me make sure that I understand that. So at
4 Loyola, you are now managing other conduct officers?

5 A. Right, right, right.

6 Q. Okay. So you weren't doing as many of the direct
7 investigations at that point; you were supervising the
8 information and then what the conduct officers were
9 doing?

10 A. No, I was still doing investigations because I served
11 in a dual role, so not only was I the assistant
12 director. I think they called it residential
13 education, but that education was the conduct side. I
14 also served as a community director on the law school
15 campus, so I had my own students that I was
16 responsible for and hearing -- in cases, I heard
17 additionally, the other role I had there was a Title
18 IX investigator on campus.

19 Q. And how was the Title IX responsibility, how was that
20 different than what you had been doing up through that
21 time in terms of your career?

22 A. Sure. So Title IX investigator required training, so
23 I had to go to a week's worth of training to make sure
24 that I understood the policies and procedures
25 associated with Title IX, and so then when cases were

1 assigned to me, I would, you know, go forward as the
2 policy dictated and pursue case -- and investigate
3 cases.

4 Q. And who offered that training?

5 A. I -- the ASCA. It's the conduct association that was
6 doing it, and it's called the Gehring Institute [sic].

7 Q. Do you know how that's spelled? Is it G-e-h-r --

8 A. Gehring -- Gehring has an "h" in it, so it might be
9 G-h-e-r-i-n-g, or I might have misspelled that, but
10 it's called the Gehring Institute, and it's run
11 through the ACSA, ASC -- American Student College
12 [sic] Association -- or conduct officer, and I
13 attended that two years in a row. It's a five-day
14 training, and then after you do that, as I continued
15 in my third year, we brought them to campus, we
16 brought trainers to campus to train us because every
17 year you need to be -- you have -- what is it
18 called -- additional training every year.

19 Q. So that was part of, like, a continuing education
20 program that --

21 A. Right, right, right. As long as you're serving as a
22 Title IX investigator, there are certain requirements
23 that need to be made or met and training requirements
24 in terms of you serving as a Title IX investigator.

25 Q. And the requirement comes from Title IX, itself, or

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1 from the university?

2 A. Both. University wants -- want their Title IX
3 investigators trained, as well as, you know, the
4 associations will tell you and the laws will tell you
5 that you want trained investigators serving in -- at
6 your universities, the guidance, I should say.

7 Q. So while you were at Loyola, did you stay in that job
8 the entire time?

9 A. I did. I stayed there for three years, yep, in that
10 same role.

11 Q. And that was approximately from 2015 until --

12 A. 2018, June.

13 Q. During your time at Loyola, did you have -- can you
14 estimate how many investigations of sexual abuse or
15 sexual harassment you investigated?

16 A. 50-plus a year estimated. That's how many cases ran
17 through our office.

18 Q. And was your experience that most of those cases were
19 well-founded?

20 MR. PORTER: Objection, form.

21 A. I'm not sure what that means.

22 BY MR. FLORES:

23 Q. Sure. From -- of the -- let's just assume for
24 purposes of this question that there were 50 cases
25 each year. Can you estimate approximately how many of

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1 those 50 cases ended up with a finding that the
2 allegation was true?

3 A. That --

4 MR. PORTER: Objection, form, calls for
5 speculation.

6 A. I don't know the configuration, but I would say more
7 students were found responsible than not, but I don't
8 know the numbers.

9 BY MR. FLORES:

10 Q. And can you tell me the most prevalent type of
11 complaint that would have made up -- that would have
12 been part of those 50?

13 MR. PORTER: Objection, form, foundation.

14 A. So specifically Title IX, it would have been sexual
15 assault, and it would have been sexual harassment, it
16 would have been stalking. We saw a -- we saw it
17 almost every different -- how they're defined, we saw
18 just about every type of case, but those were probably
19 the ones I can mainly think of.

20 BY MR. FLORES:

21 Q. Did you ever have a situation where the allegation of
22 sexual abuse was made by a man?

23 A. Yes.

24 Q. Was that exceedingly rare or fairly common?

25 MR. PORTER: Objection, form.

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1 A. I would say rare. Specifically, if you look at -- if
2 you look at the national figures, that's in line with
3 the national figures, so it's not unusual that you
4 would have less males reporting than you would have
5 females, and that's in line with the national numbers.

6 Q. Can you assign a percentage to what would have been
7 the number of male victims or alleged male victims?

8 MR. PORTER: Objection, form.

9 A. Unfortunately, I can't give you a percentage. I just
10 know it was less than female.

11 BY MR. FLORES:

12 Q. Okay. What type of case made up the largest part of
13 your case load, male on female, female on male, male
14 on male or female on female?

15 A. I would say male to female.

16 Q. With the male as the aggressor?

17 A. Mm-hmm. Which is, again, in line with the national
18 statistics, yeah. Yeah. In terms of what gets
19 reported.

20 Q. Prior to coming to Loyola, had you received -- had you
21 received any training with respect to Title IX?

22 A. Other than the policies. So we, as residential life
23 staff at every institution that I've been a part of,
24 we need to be informed so that if we saw a Title IX
25 matter appear, we were responsible employees and had

1 to report that up to the director of Title IX at that
2 institution, and so I've experienced that almost in
3 every single place I've worked other than London
4 because we didn't have, let's say, a Title IX director
5 because it was Europe. So that would be the one place
6 where I didn't have that, but we always had to be
7 informed of where we can send a student if they needed
8 information or we saw a report come through with a
9 Title IX matter.

10 Q. At Loyola, did you ever investigate allegations where
11 the aggressor was allegedly a member of the faculty or
12 staff?

13 MR. PORTER: Objection. I'm sorry, I just
14 have to make sure I understand. Are you asking her
15 personally, or are you talking about the institution?

16 MR. FLORES: No, her personally.

17 A. No, that was not my responsibility.

18 BY MR. FLORES:

19 Q. So you dealt exclusively with student cases?

20 A. Correct.

21 Q. Prior to the training -- well, let me ask can you
22 please describe the subject matter and the different
23 types of areas where you received training where you
24 went for that ASCA training course?

25 A. Well, sure, they train you on the policies that have

1 been instituted by the government. You learn about
2 various laws that impact the policy changes, and then
3 you also -- you also review your own campus policies
4 too, and so you're trained on how to investigate. We
5 were also trained on, I think it was my second year,
6 what's called trauma informed training that was added
7 the second year. So that way we knew what to do with
8 both students who were reporting it and give -- and
9 making sure that we were considering the trauma that
10 can be impacted by students who are respondents and
11 complainants.

12 And then you're trained on any new laws
13 that are added or changed, new policies and
14 procedures. So each year -- and that's why we have
15 the review each year to make sure we are up to date on
16 what is current.

17 Q. Okay. So you attended that training for two years?

18 A. Mm-hmm.

19 Q. And then the third year you brought trainers to the
20 campus?

21 A. Right, right. Yeah, the training was a bit different,
22 it was on campus, yeah.

23 Q. And are you familiar with -- well, let me go back.
24 Let's talk a little bit about the actual investigation
25 training.

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1 A. Mm-hmm.

2 Q. Did that include training on how to conduct
3 interviews?

4 A. Yes.

5 Q. And did that include training on how to protect the
6 chain of evidence?

7 A. I'm not sure what you mean in terms of, like, when you
8 receive information, how to protect it; is that what
9 you mean?

10 Q. Yeah, how to protect or preserve the chain of
11 evidence. So whether it's a statement or it's an item
12 of clothing, did you --

13 A. Yes.

14 Q. -- receive training in those courses on how to
15 maintain that chain of custody?

16 A. Yeah, something that was talked about was definitely
17 if a victim was raped, you know, that you would want,
18 you know, discussions about how to preserve the
19 clothing or even reminding students if you have any
20 evidence not to delete it and save it. So that's
21 something that we would -- when we would meet during
22 our investigations, we would inform the
23 complainant/respondent that if you do have any
24 evidence to share, don't delete it, and you can submit
25 it to us if that's related to the case.

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1 Q. And did you receive any training to equip you so that
2 you could go out and collect evidence about an alleged
3 student conduct violation?

4 A. Yes. In terms of if, for instance -- I can give you
5 an example. If I'm aware that somebody mentions that
6 there was a -- something happened in a residence hall
7 and I'm aware that there's cameras in the lobby and
8 there was an incident in the lobby, I would then seek
9 out to see can I get ahold of that camera to see if I
10 can find any video if I -- if I'm aware that the
11 evidence is there. And that's why we always ask the
12 respondent and the complainant if there's any evidence
13 that you have to add to the case, please let us know
14 so we can add it to the case.

15 Q. Okay. What was your responsibility as a Title IX
16 investigator in terms of maintaining evidence?

17 A. You mean like once it was submitted to me?

18 Q. Right, what was your responsibility or what were you
19 trained to do?

20 A. Yeah, so I would save that evidence. Obviously, I
21 wouldn't share it with anyone, you just save it, and
22 then you add it to the report as an appendix.

23 Q. Okay. So let me just give you a hypothetical, just I
24 need to tease this out, I want to get a better sense
25 of what that training involved. Let's suppose there

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1 was an allegation that some type of sexual event had
2 happened in a dorm room and there was -- someone got
3 hurt on top of that, so there may have been some
4 blood, there may have been other body fluids. Would
5 you, as a Title IX investigator, would you be the
6 person responsible to go and collect that, or would
7 you reach out to the police department, what's -- how
8 do you deal with that knowledge? What's your
9 responsibility?

10 MR. PORTER: Objection, form, foundation.

11 A. I wouldn't request somebody to give me that data, but
12 if it was available by a police report, and I'm made
13 aware of it, it's something that I could request
14 depending on the campus I'm working at. So every
15 campus has different measures of what you can do, but
16 I, myself, I would never go and ask for blood samples
17 or anything like that.

18 BY MR. FLORES:

19 Q. If there's no police report made as part of the
20 Title IX investigation, what happens then with that
21 evidence?

22 MR. PORTER: Objection, form, foundation.

23 BY MR. FLORES:

24 Q. So if someone provided to you a piece of hard
25 evidence, whether it was clothing, whether it was a

1 bottle of beer, whether it was something tangible,
2 what would your responsibility be in terms of
3 safeguarding that particular item of evidence?

4 A. Well, I wouldn't collect it personally because I would
5 not be able to process it, and so what I would do is I
6 would advise the student if they want to move forward,
7 they can report it to the police so they can help them
8 further, or if it's something that a nurse in a
9 hospital can do testing on a doctor so they can get
10 evidence and pursue it through the police matter, you
11 know, if they're going to take it to a civil court,
12 then I would advise them that's one of their options,
13 but I, myself, would not handle any evidence like
14 that.

15 Q. So if a student actually provided that evidence, you
16 would tell them I'm sorry, I can't accept that
17 evidence, you'll have to either take that to the
18 police or some other law enforcement agency?

19 A. Right.

20 Q. While you were at Loyola, you were there for three
21 years; is that right?

22 A. Yes.

23 Q. Did you as part of your training become familiar with
24 misdemeanor and felony violations related to sexual
25 harassment, sexual assault, the kinds of cases that

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1 you would be responsible for as a Title IX
2 coordinator?

3 MR. PORTER: Objection, form.

4 A. No, I -- that's not my responsibility as a Title IX
5 investigator.

6 BY MR. FLORES:

7 Q. So you --

8 A. So I wouldn't -- I would defer students to the experts
9 in that matter if they had questions specifically
10 about the definitions of what they are or the
11 different laws, you know, whether it's a police matter
12 or a lawyer needs to get involved, I would defer
13 students to go to the experts.

14 Q. Did you ever -- did you ever testify at -- in a
15 criminal case or a civil case at -- while you were at
16 Loyola as a witness to what you had been told by a
17 student or evidence that you are aware of?

18 MR. PORTER: Objection, form.

19 A. No.

20 BY MR. FLORES:

21 Q. How large was the Loyola Title IX office while you
22 were there?

23 A. There was three of us when I started, and with that
24 office, if I include the general counsel, and also,
25 the next year we added more investigators, so it grew

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1 to about five or six, and I think it even expanded my
2 third year just to have more investigators, so it was
3 a small team to start and then it expanded.

4 Q. In Title IX matters, what's your understanding of what
5 the evidence standard is for proving a Title IX
6 violation?

7 A. Right. So there's a preponderance of evidence
8 standard, and then it changes. Some institutions
9 might do clear and convincing, so depending on the
10 institution that you're at, but it's a preponderance
11 of evidence.

12 Q. At Loyola, do you remember what it was?

13 A. I believe we dealt with preponderance of evidence, if
14 I can recall, yes.

15 Q. Under Title IX, who bore the burden of proof in a
16 case?

17 A. The university.

18 Q. And how does that differ from a typical civil case if
19 you know?

20 A. I'm not sure I know a civil case, I don't know.

21 Q. Now, I had asked you earlier if you had ever been
22 involved in a -- in a case or in a lawsuit where you
23 were involved as a witness. Were you ever involved in
24 a lawsuit while you were at Loyola as a defendant?

25 A. No.

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1 Q. Are you familiar or do you remember the case Broussard
2 versus Loyola?

3 A. I was not involved with that.

4 MR. PORTER: Can you say that name again?

5 MR. FLORES: Yeah, Broussard,

6 B-r-o-u-s-s-a-r-d, versus Loyola.

7 A. The name sounds familiar but I --

8 BY MR. FLORES:

9 Q. Well, this was a case in 2018 that was brought by a
10 law student, and for at least the initial filing and
11 for a period of time, you were a named defendant.

12 A. Yeah, the name is familiar, yeah, yeah.

13 Q. Okay.

14 A. But I had no -- I was never asked to go to court,
15 never asked to give a statement at all.

16 Q. Did you ever talk with the general counsel's office
17 about it at Loyola?

18 A. Yes, because we were in communication with them
19 because it's a Title IX office, but I never was asked
20 to participate in a lawsuit.

21 Q. Okay. Are you familiar with an organization called
22 ATIXA or A-T-I-X-A, the Association of Title IX
23 Administrators?

24 A. Mm-hmm.

25 Q. Are you a member or have you received training from

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1 them?

2 A. I'm not a member but our director at Wayne State
3 University is a member, and so she will organize
4 trainings for us making sure that we meet the
5 standards, and so a lot of times ATIXA shares
6 information with her about our training needs.

7 Q. All right. Let's, if we can, it's about 10:53. Are
8 you good or would you like a five-, ten-minute break?

9 A. I'm good if you want to continue.

10 Q. Let's move to your tenure at Wayne State.

11 A. Okay.

12 Q. When did you start working for Wayne State?

13 A. In July 2018. So a month after I left Loyola.

14 Q. And did you leave Loyola with that job already having
15 been hired for it?

16 A. No, I left Loyola to be closer to family in Michigan
17 knowing that I would be searching for jobs when I came
18 back in June, and they had an opening, and so I went
19 ahead and applied.

20 Q. And do you remember who you interviewed with?

21 A. Yes, I had interviewed with Dean Strauss for my
22 current position as a Title -- excuse me, as an
23 associate director for this position.

24 Q. So can you give me the actual title that you ended up
25 receiving after being hired?

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1 A. Sure. My title is associate director and student
2 conduct officer in the dean of students office.

3 Q. And Dean Strauss was the dean for the offices of the
4 student office -- the office for students?

5 A. Yes, he's the current dean, yes.

6 Q. I apologize, I need to just go back real quick to
7 Loyola. While you were at Loyola, one of the -- there
8 have been over the last couple of years a number of
9 student led efforts to try to address violence on
10 campus, and one of those was the It's on Us campaign;
11 are you familiar with it?

12 A. I'm familiar with the campaign, yes. That started, I
13 believe, with the government.

14 Q. And do you know if the campaign was active at Loyola?

15 A. I know we had campaigns, but I can't recall right now
16 which ones we dealt with, which ones we held.

17 Q. Okay. And you don't -- were you personally involved
18 in any of those campaigns as a Title IX coordinator?

19 A. No, as an investigator, I -- if I'm asked to be
20 present at something to help answer any questions, I
21 would go, so that, you know, in my role. I mainly
22 served as a investigator, and if I needed to provide
23 education to students and answer questions, I would
24 always make myself available on campus.

25 Q. In 2011, the Assistant Secretary For the Office of

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1 Civil Rights for the United States Department of
2 Education sent out what is colloquially called a Dear
3 Colleague letter dealing with Title IX. Does that
4 ring a bell? Are you familiar with that letter?

5 A. I have familiarity. I would need to reread it because
6 it's been such a long time, but I -- we are aware,
7 it's part of our training to be notified that the
8 government sends Dear Colleague letters that we should
9 be aware of.

10 MR. FLORES: If I could have -- Bailey, if
11 you could put up on the screen **Exhibit C**?

12 VIDEO TECHNICIAN: One moment.

13 MR. FLORES: And if you could go down.

14 MR. PORTER: Will this also be provided in
15 the chat?

16 VIDEO TECHNICIAN: Yes, one moment.

17 MR. FLORES: Bailey, let me know when you
18 can see it, okay?

19 MR. PORTER: Oh, I see it, thank you.

20 MR. FLORES: Okay.

21 INTRODUCED FOR DISCUSSION:

22 **EXHIBIT C**

23 10:58 a.m.

24 BY MR. FLORES:

25 Q. Ms. Camaj, can you see it, as well?

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1 A. Yes, I see it.

2 Q. This is the letter that I'm referring to which is a
3 2011 letter, and it was put out by the office for
4 civil rights, and your testimony is that you were --
5 you're generally familiar with that Dear Colleague
6 letter?

7 A. Yes.

8 Q. And can you recall that one of the major portions of
9 that letter dealt with what the proper standard of
10 evidence would be -- should be in a Title IX case --

11 A. I would --

12 Q. I'm sorry.

13 A. That's okay. I would have to read it because I -- I
14 don't recall off the top of my head, but I'd want to
15 make sure to read it and then answer your question.

16 Q. Okay. So I'm just trying to think. This is several
17 pages long, and most of what is in here is really
18 unnecessary for purposes of answering my questions.

19 MR. FLORES: If we can -- Bailey, is it
20 possible for you to, let's see, scroll down to -- just
21 keep going page by page, and I'll identify the area,
22 the portion that I'd like Ms. Camaj to read just to
23 see if it refreshes her recollection.

24 EXHIBIT TECHNICIAN: Yes, I can also give
25 you control of the document if you'd like.

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1 MR. FLORES: Okay.

2 EXHIBIT TECHNICIAN: There you go.

3 MR. FLORES: All right, bear with me,
4 Ms. Camaj, until I get down to that section.

5 MR. PORTER: I've also printed it out, and
6 I'm handing it to the witness.

7 MR. FLORES: Okay.

8 MR. PORTER: While you find that, do you
9 mind if we take a quick five-minute break?

10 MR. FLORES: Yeah, that's fine.

11 MR. PORTER: Okay.

12 MR. FLORES: Why don't we get back here at
13 11:10?

14 MR. PORTER: That's fine by me, that will
15 work. Thank you.

16 MR. FLORES: And Bailey, if you'll work
17 with me, then I'll have that identified for Ms. Camaj.

18 EXHIBIT TECHNICIAN: Sure.

19 (Recess taken at 11:01 a.m.)

20 (Back on the record at 11:09 a.m.)

21 MR. PORTER: Obviously you're not waiting
22 on us. I think we're all set over here.

23 MR. FLORES: Okay, great.

24 BY MR. FLORES:

25 Q. So let me direct your attention to the last paragraph

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1 on what is marked in blue at the top, page 11 of 20,
2 and ask you or give you time to read that paragraph.

3 A. Is this the one that I'm looking at?

4 Q. Let's make sure it is.

5 A. It starts with "As noted above..."?

6 MR. FLORES: Bailey?

7 EXHIBIT TECHNICIAN: Yes.

8 THE WITNESS: Okay.

9 MR. FLORES: Yeah, so if you'll read that
10 last paragraph, and then it flips over to the next
11 page. Bailey, when she's ready, just move it to that
12 next page so she can read the remainder of that
13 paragraph.

14 EXHIBIT TECHNICIAN: Yes.

15 THE WITNESS: Okay, I'm ready.

16 Okay.

17 BY MR. FLORES:

18 Q. Okay. Does that refresh your recollection about the
19 required standard of evidence that the civil rights
20 office said was applicable in Title IX cases?

21 A. Yes.

22 Q. And your testimony earlier was that at Wayne State or,
23 rather, at Loyola, the standard of evidence was a
24 preponderance of the evidence; is that correct?

25 A. Yes.

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1 Q. What was the standard of evidence when you arrived at
2 Wayne State Title IX cases?

3 MR. PORTER: Objection, foundation.

4 BY MR. FLORES:

5 Q. Do you -- I'm sorry, let me rephrase it. When you
6 first arrived at Wayne State, did you take time to
7 familiarize yourself with the Title IX process as it
8 was carried out at Wayne State?

9 A. I will say that I was not a Title IX investigator my
10 first year at Wayne State, and of course, I
11 familiarized myself as a part of our training in being
12 a responsible employee, and it was a preponderance of
13 evidence.

14 Q. So from 2018 until sometime in 2019, you were not a
15 Title IX investigator?

16 A. Correct.

17 Q. What was your title?

18 A. Associate director and student conduct officer.

19 Q. And how did the responsibilities of that job differ
20 from a Title IX investigator?

21 A. Well, I'm not responsible to hear Title IX cases or
22 investigate them.

23 Q. One of the reasons that -- or, rather, are you aware
24 that when the -- that the Department of Civil -- the
25 Office of Civil Rights' Dear Colleague letter created

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1 a stir within the Title IX community? Are you
2 familiar with that?

3 MR. PORTER: Objection to form.

4 A. I'm not sure what you're referring to.

5 BY MR. FLORES:

6 Q. Well, let's just skip that. Let's go to page 17 of
7 this document, please, Bailey. And go down a little
8 farther. Stop right there. Can you please read that
9 paragraph to yourself, Ms. Camaj, the top paragraph?

10 A. The top?

11 Q. It starts with "When OCR finds...".

12 A. Okay.

13 Q. Do you understand who the letter is referring to when
14 it talks about "recipient"?

15 A. I'm going to assume it's the -- the university.

16 Q. That's correct. That's my understanding, as well.

17 So in your words, can you tell me based on
18 this paragraph what one of the major penalties the OCR
19 can impose on a university if they fail to properly
20 enforce Title IX?

21 MR. PORTER: Objection, form.

22 A. Well, it says it right there in the last sentence,
23 "funding."

24 BY MR. FLORES:

25 Q. Okay. Did you ever receive any training once you

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1 became a Title IX investigator as to the consequences
2 of not performing your job properly?

3 MR. PORTER: Objection, form.

4 A. Not specifically other than to say, you know, but we
5 are aware that we must follow proceedings because they
6 will take funding away, so that's something that we
7 were aware of, that I was aware of.

8 BY MR. FLORES:

9 Q. All right, thank you.

10 MR. FLORES: All right, you can take that
11 document down, Bailey.

12 BY MR. FLORES:

13 Q. Now, do you remember whether or not you disclosed to
14 Wayne State that you were sued in federal court, you
15 were a named defendant for a period of time while you
16 were at Loyola?

17 MR. PORTER: I'm sorry, can you repeat
18 the -- I didn't catch the first part of that question.

19 BY MR. FLORES:

20 Q. Did you disclose to Wayne State when you were being
21 interviewed that you had been sued in federal court
22 for violating Title IX?

23 A. No, because I was not a part -- I never participated
24 in the proceedings.

25 Q. But you knew that you were a named party to that

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lawsuit though?

A. To be honest, I don't recall being -- I really don't remember.

Q. Okay. That's fine, thank you.

A. Yeah.

Q. During your first year at Wayne State, what were your primary duties on a daily basis?

A. Okay. So I was serving as a student conduct officer. I also supervised our office staff along with Dr. Strauss. We also in our office received CARE reports from the community about concerns they have about students, so I served as what you would call a CARE officer and respond and contact students and offer resources, so I would serve in both of those roles. I would also offer trainings about academic misconduct process, and so that was the extent, and meet with other departments to train their faculty about the procedures and their responsibility in the process.

Q. So you seem to be making a distinction between student conduct offenses and Title IX offenses. Can you explain what the difference is?

A. Well, Title IX, if you violate a Title IX pol -- it's in the code. But what I'm making the distinction on is the types of responses in terms of investigation

1 because Title IX has specific procedures to follow
2 that differ with my day-to-day job. So when I meet
3 with students for concerns, it differs. I don't have
4 any of the same responsibilities that I would to
5 Title IX procedures.

6 Q. So is it fair to say that you might be investigating
7 the exact same type of case, but sometimes it is
8 covered by Title IX and sometimes it isn't?

9 A. No.

10 MR. PORTER: Objection, form.

11 A. No, that's not what I'm saying.

12 BY MR. FLORES:

13 Q. Okay. Give me an example of a typical student conduct
14 offense that you would investigate.

15 A. If there was a fight between students and somebody
16 filed charges alleging that one or the other violated
17 the code, and a typical charge in that code might be
18 under the section 4.3 or 4.6 of our student code, so
19 it could be physical or verbal threats or abuse, or
20 you could file a 4.6, which is disorderly behavior,
21 and so I could hear that case and make a
22 determination, and then the student, in turn, gets to
23 accept or deny my determination. So that's one
24 example.

25 Q. Okay. And is -- can you describe a Title IX case that

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1 you would during your first year not have authority to
2 investigate?

3 A. I wouldn't investigate anything Title IX because I'm
4 not an investigator at that time.

5 Q. So any --

6 A. If anything -- if I hear about a Title IX matter, I
7 would forward it on to the director because I didn't
8 serve in that capacity.

9 Q. Were there any significant differences in how student
10 conduct cases were handled at Loyola and Wayne State?

11 MR. PORTER: Objection, form.

12 A. In Loyola, I -- the students didn't have the
13 opportunity to accept or deny the addition of a
14 hearing officer, whereas with the Student Code of
15 Conduct, they have that opportunity, so that's one
16 difference.

17 And of course, language is different, but
18 you know, every code's language was a bit different.

19 Q. Did you receive any training when you first arrived at
20 Wayne State on the Wayne State Student Code of
21 Conduct?

22 A. I had meetings with the previous person in that
23 position.

24 Q. Did you receive materials or binders or any kind of
25 other documentation about what the responsibilities

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1 were for someone assuming your position from --

2 A. We had -- you have the student code of conduct that
3 tells you what is expected of you.

4 Q. Was there any -- I'm sorry.

5 A. Another --

6 Q. Was there any other material? Was there any other
7 material?

8 A. Sure, sure. Materials in terms of, you know, sample
9 letters that you would normally send out to students
10 or sample, what do you call it, outcome letters, like,
11 what I'm referring to, when a decision is made to make
12 sure you include all the information for the student
13 when they receive your letter about your outcome. So
14 I got to see what was sent out before.

15 Q. And I may have cut you off. Was there an additional
16 manual or policy manual that also was included in the
17 material that you were provided?

18 A. Everything is online, so everything there is to read
19 about our policies and procedures is all available
20 online.

21 Q. Have you had a chance to read the complaint filed in
22 this case?

23 A. No.

24 Q. I want to talk a little bit about kind of generic
25 investigation directives and policies that you may or

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1 may not have had at Wayne State just to get an idea as
2 to what parameters you were working within during that
3 first year. Would you agree or disagree with the
4 statement that every investigation is unique?

5 MR. PORTER: Objection, form.

6 A. Every investigation can be unique.

7 BY MR. FLORES:

8 Q. Okay. You're making a distinction different from my
9 statement. Can you explain that?

10 A. You may have similarities in investigations, so in a
11 lot of ways, they could be similar, and then in other
12 ways, it could be unique just on virtue of different
13 human beings participating.

14 Q. Okay. Would you agree that it's important to have a
15 strategy when starting an investigation?

16 A. I would say yeah, you want to strategize, sure,
17 mm-hmm.

18 Q. And would you agree that an experienced and
19 well-trained investigator typically has a well
20 developed strategy that he or she uses to make sure
21 that all aspects of the case are covered?

22 MR. PORTER: Objection, foundation. Are
23 you asking her about her Title IX investigation
24 duties --

25 THE WITNESS: Yeah.

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1 MR. PORTER: -- or her role as Student Code
2 of Conduct --

3 MR. FLORES: Let me rephrase.

4 BY MR. FLORES:

5 Q. With respect to title -- to your responsibilities as a
6 Title IX investigator, which you assumed in your
7 second year, would you agree that a well developed
8 strategy is necessary in order to make sure all of the
9 bases are covered?

10 A. Yeah.

11 Q. So as a student conduct officer, you have different
12 responsibilities, but you're also conducting
13 investigations; is that correct?

14 A. Mm-hmm.

15 Q. Can you tell me just generically when you receive a
16 complaint, what was your -- typically your first
17 action after receiving the complaint?

18 A. It depends on how I received the complaint. Is it via
19 email, is it via phone call, is it via the forms we
20 have online and which form is used? There's a
21 complaint form, there's a nonacademic misconduct form,
22 and there's an academic misconduct form, so depending
23 on the form and what's written, I would respond by
24 writing to the reporter and ask them to specify what
25 their concerns are, and if it's a -- where -- if it's

1 a nonacademic misconduct form that's submitted, that's
2 typically indicative of someone who wants to file
3 charges against a student because they believe they
4 violated the code of conduct, and even then, I clarify
5 the charges they selected because they're not all
6 experts in the code, and so sometimes they select a
7 charge that's not to relevant to what they're sharing
8 in terms of the information they're concerned about,
9 and then I would clarify that, and so it becomes a
10 code of conduct, that's how I would proceed.

11 I would just always reply to the person
12 filing the report to get a better understanding of the
13 complaint so I know, you know, which way to proceed.

14 Q. So once you've had a chance to talk to the reporter
15 and provide that reporter with some additional
16 information, what's the next step?

17 A. Well, if it's not a conduct charge, it depends on what
18 the desired outcome is. Is it coming from a faculty
19 member? Is it coming from a student? Is it coming
20 from staff? It could be anything that we -- we get
21 all kinds of reports, so we really have to assess what
22 are we following up with. Are we following up with
23 the student's concerning behavior that needs to stop?
24 Are we following up with a simple question? It just
25 really varies.

1 Q. Let's take a complaint from one student against
2 another. You had received a complaint, you've now
3 responded to the reporter to try and narrow and
4 clarify what they're complaining about, and after that
5 takes place, what's the next step for you?

6 A. Sure. If it's a -- if it's a student who's -- let's
7 say it's a roommate or someone like that or they're
8 concerned about a friend's behavior and they would
9 like us to just have a conversation with the student
10 about their concerning behavior and then we will do
11 that, we'll follow up with that other student and have
12 a conversation.

13 If it's an issue where they would like to
14 file charges against the roommate because they have
15 been affected and they thought that the student
16 violated the policy, then I would proceed by inviting
17 the student to meet with me and deal with it in a
18 conduct matter.

19 Q. How would you reach out to the student that is accused
20 in a student conduct case?

21 A. Sending them a letter.

22 Q. And is that -- that's not snail mail, that's an
23 electronic letter; is that correct?

24 A. We transitioned to both. When I first started at
25 Wayne State, we would send letters via mail, and then

1 we transitioned to electronically, and we use our
2 Maxient software system to send students letters to
3 invite them to meetings with us, both concerning
4 behavior meetings, complaint meetings, and also
5 conduct meetings. They all get the letter from
6 Maxient software.

7 Q. Are there any time limitations or time recommendations
8 in order to -- from the time that you get a complaint
9 until the time that you reach out to the accused
10 student?

11 A. Not with concerning behavior or -- and if a
12 complaint -- if it's a conduct matter, we try to be --
13 we try to expedite matters. The only time that we
14 cannot be, you know, timely is if we have taken
15 vacation days or typically in the beginning of the
16 school year when we have more cases, it takes up a lot
17 of our time, so it could be delayed by a week, but
18 it's always our intention to respond quickly. So I
19 know myself personally, I never have the intention to
20 delay, and I can only be impacted if I've taken time
21 away or I have trainings to attend to that keep me out
22 of the office.

23 Q. And is there typically a timeframe that you gave to
24 the accused in terms of when they need to respond back
25 with you?

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1 A. I typically don't give a timeframe in terms of -- it
2 depends on is it my outcome letter that they need to
3 respond to or my -- to meet with me after I assign
4 them a meeting time? I'm not sure what you're asking.

5 Q. Yeah, I'm still at the requesting a meeting with that
6 student.

7 A. Mm-hmm.

8 Q. So --

9 A. Yeah, I will -- I will select the date, and they're
10 told if they're not able to make that meeting time,
11 they need to contact me within 48 hours, and I will
12 reschedule our meeting. And I'm very flexible with
13 that.

14 Q. Now --

15 A. Especially if a student has to go on vacation or
16 something, I can meet with them later on.

17 Q. Okay. So there's flexibility --

18 A. Yes.

19 Q. -- in the timing of --

20 A. Right.

21 Q. -- meeting with you?

22 A. Right.

23 Q. And where does the meeting with you typically take
24 place?

25 A. Typically in my office, and then when we are remote,

1 it will be, obviously, on Teams video or Zoom
2 depending on what the student has at their desktop.

3 Q. So during the first year that you were at Wayne State,
4 you would meet in your office with any student that
5 was coming at your invitation?

6 A. Right.

7 Q. And what happens if a student declines your
8 invitation, says I don't want to meet with you?

9 A. It depends on what I'm asking them to meet for. You
10 know, when I reach out to students to offer them
11 resources and support as -- in my role as a care
12 officer, that's fine, they don't have to meet with me.

13 If it's a behavioral concern where I'm
14 requesting them to meet with me and it's something
15 that the dean of students is aware of, I will let him
16 know that, hey, this student hasn't met with me, and
17 then, and then he will make a determination if he will
18 meet with them and follow up. And if a student
19 doesn't meet with me for conduct, it goes over to the
20 dean, and that's on 11 -- in section 11, it tells you
21 that if a student fails to show up, then the conduct
22 officer needs to refer the case to the dean of
23 students. So anyone that doesn't meet with me, I
24 notify the dean of students to let him know in any
25 case.

1 Q. When you meet with a student, are you in a separate
2 room, or are you out in the open with the student?
3 What are the circumstances of that, the physical
4 circumstances of that meeting?

5 A. Sure. The dean of students has an office suite, and
6 inside that suite, I have my own office. The students
7 are positioned by the door, and I'm positioned on the
8 far wall behind a desk, and I allow the student to
9 keep the door open or to close the door depending on
10 their comfortability.

11 Q. And what's your -- how do you typically present
12 materials in a student conduct situation to the
13 student that's come in to -- for this meeting?

14 A. Well, the student code tells the student, and I know a
15 lot of students don't read the code, it tells them
16 that if you wanted materials presented to you prior to
17 your meeting, you can contact the conduct officer, and
18 that will be supplied to you, obviously redacted if
19 there's any information that needs to be redacted, and
20 then during my meeting, I let the -- well, before
21 that, in the letter that's sent to them, they are
22 notified of the specific charge, so they will be told,
23 you know, this is the violation that's alleged to have
24 occurred, 4.6, 4.3, and we give them the specifics of
25 the account, about two or three sentences about what

1 we're talking about because that's what's requested by
2 the Student Code of Conduct, so I'm required to put
3 that in a letter when I send that to students whenever
4 there's a conduct matter that charges have been filed.

5 In a -- so, hopefully, that answers your
6 question.

7 Q. Is it fair to say that some students that you meet
8 with in that -- or that you met with in that context
9 would come extremely emotional, agitated, I mean they
10 were anxious to kind of -- coming to sit down with you
11 to talk about the student conduct issue? Is that
12 fair?

13 MR. PORTER: Objection, form.

14 A. I -- I'm aware that students can get nervous coming to
15 the Dean of Students Office to meet with me, and I,
16 you know, I take students as they are.

17 BY MR. FLORES:

18 Q. If a student comes in pretty agitated, do you -- what
19 techniques do you use to kind of lower the temperature
20 and...

21 A. I -- I let the student know why they're meeting with
22 me and my role and responsibility within the meeting.
23 So if it's a CARE meeting, I let them know that I'm
24 here to offer resources. If it's a concerning -- if
25 we have concerns about a student's behavior or we

1 received a complaint, I will let the student know,
2 hey, we received a complaint and I want to discuss it
3 with you and concerning behavior, let's say classroom
4 behavior, I will let them know what the issue is
5 there, answer any questions they have, and I will
6 clarify for them if I have a role in determining
7 anything that I would need, and typically in a CARE
8 case, in a concerning behavior case, I don't make any
9 determinations other than to tell the student what we
10 expect of them if it's a concerning behavior and what
11 we expect of their behavior in the classroom. So
12 that's just an example.

13 If I'm meeting with a student for a CARE
14 case, I'm providing them resources. Typically, you
15 can say to CAPS Counseling or Students With
16 Disabilities Services Office, hoping to connect them
17 so that they can get assistance for whatever they
18 need, and if it's a conduct case, I let them know -- I
19 actually ask them if it's a conduct case are they
20 familiar with the proceedings and would they like me
21 to review anything. And I let them know about section
22 4.0, which is the alleged violations. I let them know
23 about section 5.0, which is the sanctions. I let them
24 know their rights in terms of if I'm permitted to make
25 a decision, they're permitted to accept or deny, and I

1 let them know how that would happen, and then I let
2 them know that if they deny, it would proceed to the
3 Dean of Students Office -- the dean of students who
4 will give them the option of meeting with him or a
5 hearing committee, and I also let them know that
6 during the meeting, during a conduct case, they're
7 more than welcome to have somebody present with them
8 to serve as an adviser, and then I'd just make myself
9 available to ask any questions -- to answer any
10 questions they have about the process. And then I
11 tell them, too, that throughout the entire process
12 before it's concluded, if they have additional
13 information, they can always contact me.

14 Q. Let's take a step back. Let's talk about conduct
15 cases.

16 A. Mm-hmm.

17 Q. And you said that there's no timeframe that's required
18 between the time a complaint comes in and you meet
19 with a student but that you try to do that as quickly
20 as possible; is that right?

21 A. Yeah, the code says the language "reasonable time," so
22 whenever, you know, if a charge is filed, it needs to
23 be charged -- it needs to be filed in a reasonable
24 time, and then we are -- we should be responding in a
25 reasonable time. So that's just best practice for our

1 office, and I've done that throughout my experience
2 with code of conduct at different universities since
3 I've started as a hearing officer. So we've always
4 tried to, you know, follow up in a timely manner.

5 Q. Okay. And between the time that you get the complaint
6 and the time that the student comes in to talk about
7 the conduct offense, are you doing your own
8 independent investigation of that complaint during
9 that period of time?

10 A. Yeah, if it's a conduct case, I'm looking into the
11 matter, and I'm also asking the person filing the
12 charges if they haven't done so, that's one of the
13 reasons I'll reply to them, especially if they haven't
14 submitted the evidence they're talking about, so
15 somebody might say that they were impacted and use a
16 frame of reference to something, and if I don't see
17 that attached, I'll let them know hey, can you send me
18 that material? And even during the conduct hearing,
19 I'll let them know at any point in time, you can
20 submit any evidence both to the complainant and the
21 respondent, I will let them know you can submit any
22 evidence that you may have that's relevant to the
23 case. And additionally, you know, statements are
24 evidence too, so as you said, students can be nervous
25 when they come talk to me and answer my questions, so

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1 I always let them know that if they would like, they
2 can add an additional statement after our meeting and
3 email it to me. If they felt they couldn't express
4 themselves accurately during my meeting, I always let
5 students submit a statement if they felt like they
6 wanted to share more information after our meeting.

7 Q. In the event that the complainant's account and the
8 accused student's account remain at odds with each
9 other after they come in to talk with you, what's your
10 responsibility in terms of trying to determine which
11 account is accurate?

12 MR. PORTER: Objection, form. Are you
13 referring to a conduct case or a case of concern --

14 MR. FLORES: No. Still talking about
15 conduct cases.

16 MR. PORTER: Okay.

17 A. Yeah, so I believe the evidence, and is it more likely
18 than not that what the other person is saying is
19 truthful and they have presented truthful information
20 to me based on their statements, based on the evidence
21 provided, so that's what I look at. And in a lot of
22 cases where I don't have evidence, I'm not able to
23 find the student responsible even though they -- they
24 may have done it, I cannot find them responsible if I
25 don't have the preponderance of evidence, and so

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1 that -- that's how I typically proceed.

2 Q. Now, under the code and the school's policies, the
3 student conduct officer has the authority to resolve a
4 complaint at their level; is that correct?

5 MR. PORTER: Objection, form.

6 A. I have the responsibility to make a determination,
7 then let the student accept it or deny it, and then if
8 a student's not there, it automatically goes to the
9 dean, but if they are there and they deny it, it goes
10 to the dean. So students don't have to accept my
11 decision.

12 BY MR. FLORES:

13 Q. But you're able to make a determination and if they
14 accept it, that's where the case dies, basically?

15 A. Right, right, right.

16 Q. And are there certain kinds of cases that lend
17 themselves more often to that kind of a resolution --

18 MR. PORTER: Objection, form.

19 BY MR. FLORES:

20 Q. -- in your experience?

21 A. To which resolution?

22 Q. To a resolution where you make the determination, the
23 student accepts it, and that's as far as it goes.

24 A. Yes, most of my cases, students accept my
25 determination. In the very few cases they don't, they

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are referred to the dean of students.

Q. And are there ever cases where you don't make a determination, you just automatically send them to the dean?

A. If they don't show up.

Q. Do you give them more than one chance to show up?

A. I do. I don't have to, but I try to call the student at the time they should be present, and sometimes I catch the student, they answer the phone and I -- they can come really quick because they forgot. A couple other times, I can call the student the day after and say I'm still available to meet with you or I refer the case to the dean of students. So I really don't have to offer them another opportunity to meet with me, I can just refer directly to the dean, but I try to do my due diligence to get the student to meet with me.

Q. The code of conduct -- the Student Code of Conduct at Wayne State provides some parameters as to what types of cases are appropriate for resolution by the university, and one of them is where the offense takes place. So if it doesn't take place in a dorm or on school property, is there ever jurisdiction by the university over a case?

MR. PORTER: Objection, form and

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1 foundation.

2 A. On -- so sometimes when a complaint comes in, they
3 will let you know the person making the complaint
4 where it occurred, and then, you know, when you go
5 forward, you discover that it may have been off campus
6 or on campus, you're not sure, and so if it's on
7 campus, we have jurisdiction. If it's off campus, we
8 don't have jurisdiction.

9 Q. And when you're talking about on campus, does that
10 include a student's apartment if it's not part of the
11 university's housing?

12 MR. PORTER: Objection, form and
13 foundation.

14 A. If they are not on the property of Wayne State or are
15 not on something affiliated with Wayne State's
16 educational program, then it's off campus.

17 BY MR. FLORES:

18 Q. All right. Let's talk about -- let's talk about this
19 particular case. Do you remember how the complaint
20 came to your attention?

21 A. Yes, it was brought to my attention in the -- in our
22 office.

23 Q. Do you remember if it was online, if it was a
24 telephone call, if it was some other direct contact?

25 A. I was made aware of this complaint by staff.

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1 Q. So do you know how it came into the office?

2 A. Yes. It came in by a form.

3 Q. When you say "a form," do you mean an electronic form?

4 A. Yeah, a complaint form.

5 Q. And earlier you testified that there were several
6 types of forms that could be used by --

7 A. Right.

8 Q. -- a student --

9 A. Right.

10 Q. -- or by anybody making a complaint?

11 A. Right.

12 Q. Can you just go through the list of what those are?

13 A. Sure. It's on our -- for your frame of reference,
14 it's on our website at doso.wayne.edu, it's all -- you
15 know, Title IX is a form, a timeline report, that's
16 from the Title IX office. The dean of students has
17 the -- our new COVID noncompliance form. It has the
18 nonacademic misconduct form, the academic misconduct
19 form, the complaint form, and the CARE report form.
20 We also have what's called an ask-a-question form, and
21 we have another student organization form where people
22 can submit questions about the organizations.

23 Q. At the -- at the time that the complaint came in,
24 there were those all possible forms with the exception
25 of the COVID form, I'm assuming?

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1 A. Mm-hmm.

2 Q. Is that correct?

3 A. Yeah, the newer forms are ask-a-question and the COVID
4 form. Those are new this year, yeah, this past year.

5 Q. And you testified earlier that at Loyola, it wasn't
6 uncommon to get 50 -- have 50 conduct issues arise in
7 the course of a year. I'm assuming that Wayne State,
8 as a larger university, had even more on an annual
9 basis; is that a safe assumption?

10 A. No.

11 MR. PORTER: Objection, form.

12 BY MR. FLORES:

13 Q. No?

14 A. No, you said conduct. Your question to me was about
15 Title IX earlier --

16 Q. I'm sorry.

17 (Attorney and witness speak over each
18 other.)

19 A. -- Title IX.

20 Q. So do you have a sense of how many, on average,
21 conduct cases came before you during the time that you
22 were working on those types of cases at Wayne State?

23 A. Yeah, and that's public information to the board of
24 governors, information that's public at their
25 meetings. Off the top of my head, I couldn't tell

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1 you, but I'd want to give you accurate information,
2 but it's all online.

3 Q. Okay. If more than one complaint comes in
4 electronically through the use of those forms that you
5 mentioned, do they go to a particular person's
6 mailbox?

7 A. Depending on who has responsibility. So I receive the
8 non -- the nonacademic misconduct reports and the
9 academic misconduct reports, as I am the person who's
10 handling that matter, as I'm the student conduct
11 officer, so those forms would come to me.

12 Q. And do they come directly from the complaining student
13 or reporter, or do they come from a staff member?

14 A. No, the form comes directly to me in my inbox.

15 Q. So in this particular case, you received a complaint
16 from, we'll refer to her as Jane Doe, through the use
17 of a form --

18 A. Mm-hmm.

19 Q. -- and that form went directly from that student into
20 your mailbox?

21 A. It goes to the dean of students. The dean of students
22 has a responsibility to receive all the complaints,
23 and although I have the ability to see them, I don't
24 look at them because that's his responsibility, and I
25 only get involved when he tells me that I need to

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1 somehow be involved. So that's something that
2 Dr. Strauss handles.

3 Q. Okay. So the complaint from Jane Doe in this case
4 went from her to the complaint mailbox for the dean of
5 students?

6 A. Mm-hmm.

7 Q. Is that correct?

8 A. Yeah.

9 Q. Okay. And then from -- and then at some point
10 thereafter, you received that complaint from the dean
11 of students?

12 A. I received the information that I would need to
13 investigate the matter.

14 Q. Okay. And you received that information from whom?

15 A. It was determined at a behavioral intervention team
16 meeting that I should be the one to investigate the
17 case further.

18 Q. What is the behavioral -- what is the behavioral team?

19 A. Sure. It's a team of directors in their different
20 departments that come together to discuss concerning
21 students that reach a high risk level. One example is
22 what if a student's suicidal. So any team member can
23 bring forward a student that they're concerned about,
24 if they're especially high risk, and the behavior --

25 Q. And -- I'm sorry.

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1 A. The behavioral intervention team comes out of the Dean
2 of Students Office, but we -- it involves many
3 different departments, and that's all public
4 information that's online.

5 Q. Okay. So when Jane Doe filled out her complaint, I'm
6 trying to identify who would get -- who would be the
7 first person at Wayne State who would have seen that
8 complaint?

9 A. Well, the complaint comes to the dean of students.

10 Q. And so the dean of students in this case then referred
11 it to whom?

12 MR. PORTER: Objection, form, foundation.

13 BY MR. FLORES:

14 Q. Did the dean of students send it directly to you?

15 A. No.

16 Q. It went to the behavioral intervention team first?

17 A. For discussion, yes.

18 Q. And who makes the determination that it should go to
19 the behavioral intervention team?

20 A. All of us have a say in what cases we bring forward.
21 So each of us have a role in bringing forward students
22 or concerns to that meeting.

23 Q. Okay. But you didn't bring this particular complaint
24 to the behavioral intervention team, the dean of
25 students did that?

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1 MR. PORTER: Objection, form, foundation.

2 A. Yeah, I didn't bring it forward, no.

3 BY MR. FLORES:

4 Q. So are you part of the behavioral intervention team?

5 A. I am.

6 Q. And you were on -- in October of 2018, you were part
7 of that team?

8 A. Yes.

9 Q. So the first that you saw of the complaint by Jane Doe
10 was when you received it as part of the behavioral
11 intervention team?

12 A. When you say "received," you mean discussed or...

13 Q. Saw it, got your hands on it.

14 A. Well, it was discussed.

15 Q. Okay. Was that the first time that you had seen it
16 when you were with -- discussing it with the
17 behavioral --

18 A. Right.

19 Q. -- intervention team?

20 A. Right. Right because I don't -- go ahead.

21 MR. PORTER: Well, I'm going to -- sorry,
22 I'm going to cut in and object and instruct the
23 witness not to answer if it calls for the, you know,
24 the recitation or disclosure of attorney-client
25 privileged information.

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1 Bob, I don't want to -- I don't want to
2 step on your toes here, but it might benefit, move
3 things along if you ask who was all present at these
4 meetings, that might help.

5 MR. FLORES: Yep.

6 BY MR. FLORES:

7 Q. Can you tell me who attended that behavioral
8 intervention team meeting when the Jane Doe complaint
9 was discussed?

10 A. Sure. The people we had a part on, it would be the
11 director of counseling, it would be our -- the office
12 of general counsel, it would be the lieutenant from
13 the police department, it would be myself, it would be
14 one of my colleagues within our office of the
15 coordinator. It would be, at the time, she doesn't
16 work here anymore, the chief nursing officer or
17 someone from the Campus Health Center, who am I --
18 Student Disability Services Office, just trying to go
19 around the room and see if I've covered everyone.

20 Yeah, so those are typically the
21 departments that are there.

22 Q. And what's the purpose of that meeting?

23 A. It's to review concerns about students and to see how
24 we can help them and to make sure that they're safe on
25 campus and to determine risk, you know, what is the

1 student's behavior, what's the risk for them being on
2 campus, and what's the risk for their, you know, it
3 depends on the situation. So we're assessing the risk
4 and how we can help the student further and what
5 resources that we need to connect them to.

6 Q. Just to be clear, when you're talking about assessing
7 the risk about the student, are you talking about the
8 complainant or are you talking about the accused?

9 A. No, I'm talking about a student on campus who maybe
10 was suicidal, and so we wanted to make sure were they
11 offered all the proper services, are they in the
12 hospital, are they safe, are they coming back to
13 campus, who do we need to make sure reaches out to
14 them? And so a lot of times, we're determining who's
15 that next staff member that's going to reach out to
16 the student. Are they in housing? Are they off
17 campus? You know, what's the nature of the issue?

18 So it could be, you know, a report from
19 anywhere that we would discuss about the student -- or
20 that we're concerned about a student.

21 Q. So in this case, the student you were discussing was
22 Mr. Eid; is that right?

23 A. Yeah, we were discussing the complaint, yes.

24 Q. And you were discussing risks associated with Mr. Eid?

25 MR. PORTER: Objection. I instruct the

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1 witness --

2 A. Yeah.

3 MR. PORTER: -- not to answer if it
4 requires you to divulge attorney-client privileged
5 information.

6 MR. FLORES: Okay. Let's take a break
7 because it's noon, but David, if you could stay on
8 because I think we -- you and I just need to have a
9 little discussion about the privilege claim.

10 MR. PORTER: Sure.

11 MR. FLORES: So if we could have the
12 stenographer stay on with us, Bailey, no need for you
13 to stay on right now, and Ms. Camaj, you can take a
14 break.

15 Can we reconvene at 12:45? That would
16 give -- is that enough time for people to get a break
17 and get something to eat?

18 I can't hear you. David, I can't hear you.
19 Still can't hear you.

20 THE WITNESS: Okay. Go ahead now. The
21 line's unmuted.

22 MR. FLORES: Okay. The intervention team
23 involves five or six different people, and from what I
24 just heard from Ms. Camaj, the purpose of that was not
25 to get the legal advice for the purposes of

1 litigation; it was for purposes of adjudicating and
2 deciding the risk to a particular student. So I don't
3 see how the privilege applies just because counsel's
4 present in the room.

5 MR. PORTER: So I think what you heard her
6 say was what the typical purpose of these meetings
7 are. I can tell you that the purpose of the
8 discussions involving Eid involving general counsel
9 did involve the provision of legal advice about, you
10 know -- well, I'm not going to tell you what it was
11 about, but it was the provision of legal advice, and
12 those around the table relied on that in order to make
13 decisions on behalf of Wayne State.

14 MR. FLORES: Okay. I think the best way
15 forward is to -- I'll deal with it in the way that
16 you've said. I'm not agreeing to it, so I may follow
17 the deposition up with a motion to the Court asking
18 for an adjudication as to whether or not I'm entitled
19 to this information, but if we do that, it will be
20 afterwards, and I don't think it's -- it's an
21 appropriate use of everybody's time here to kind of
22 gum this up and start playing around with it in the
23 middle of the day.

24 MR. PORTER: I understand.

25 MR. FLORES: Okay? All right, I'm going to

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1 stop my video and mute me for -- and I'll be back at
2 12:45.

3 (Recess taken at 12:00 p.m.)

4 (On the record at 12:47 p.m.)

5 MR. FLORES: Okay. Let's go back to -- I
6 want to make sure that it's clear how that complaint
7 came in and who saw it and under what circumstances,
8 and Ms. Camaj, David, I'm sure you've talked to her,
9 you are -- the university is claiming privilege over
10 the legal advice that was provided during the course
11 of the meeting. I'm going to, obviously, ask
12 questions which may result in David reasserting the
13 privileges as to specific questions. On the privilege
14 question, don't answer because we'll have to deal with
15 that later on, but if there's no privilege asserted,
16 then you can answer that question. I'm going to do my
17 best to try to avoid those just because David and I
18 have already kind of talked about how we're going to
19 proceed, and it's not necessary to bother you with
20 that.

21 BY MR. FLORES:

22 Q. So the complaint came to your attention as a result of
23 your being involved in a behavioral intervention team
24 meeting; is that correct?

25 A. Yes.

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1 Q. And do you remember when that meeting occurred?

2 A. I do not.

3 Q. Do you know if it was shortly after the complaint came
4 in or several days after?

5 A. It may have been shortly after the complaint came in.

6 Q. I'm going to just ask a few questions, see if I can
7 help you remember. You may not be able to give us
8 more than that. On November 15th of 2018, you ended
9 up having a telephone call with the complainant; do
10 you remember that?

11 A. Yes.

12 Q. Do you remember whether or not the behavioral
13 interventional team meeting was shortly before that
14 phone call or was quite a bit of time prior to that?

15 A. If I can recall, typically what happens if we receive
16 a complaint that's brought to BIT, we talk about it at
17 the next meeting. So the date of that complaint
18 coming in, we would have done our best if it was
19 submitted to BIT or discussed at BIT to review it that
20 next week or pretty soon thereafter.

21 So I'm not very sure what that date would
22 have been. I don't remember the date of the
23 complaint. It may have been in October?

24 Q. Yeah, it was October 29th.

25 A. Yeah, yeah. So we would have probably met that

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1 following week to discuss it if not the next week
2 depending on sometimes our BIT meetings can be weekly,
3 sometimes they can be biweekly, depending on the
4 team's availability so I would have --

5 Q. And is there an official record kept of the BIT
6 meetings?

7 A. No.

8 Q. So -- and who schedules them? Who's the chair of
9 that?

10 A. The dean of students.

11 Q. So does his office or her office schedule that on a
12 regular basis?

13 A. The dean of students schedules the meetings, yes, he's
14 responsible for scheduling those meetings.

15 Q. So if anybody knew the specific date of that meeting,
16 it would be his office?

17 A. Right.

18 Q. Where does that meeting take place?

19 A. Dean of Students Office conference room, and when
20 we're virtual, it's virtual. You know, we're on Teams
21 video.

22 Q. Okay. And back in 2018, pre-COVID, that was an
23 in-person meeting?

24 A. In-person, yes.

25 Q. Okay. And does someone take notes during the course

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1 of the BIT meeting?

2 A. No, not one person is designated to take notes.

3 Q. So each person to the extent they want to, who is
4 attending that meeting, can take whatever notes they
5 want to?

6 A. Yes.

7 Q. Okay. And those notes are for their purposes, their
8 private purposes?

9 A. Yes.

10 Q. In terms of doing their job as opposed to having to
11 circulate them or for some other reasons?

12 A. Right.

13 Q. Okay. Did you make any notes during that meeting?

14 A. No. Again, I was not involved with the complaint. So
15 I wouldn't have needed to take notes.

16 Q. Okay. So at that time, you attended that particular
17 behavioral intervention team meeting, but you were
18 just there as an observer with respect to that
19 complaint?

20 A. Yeah, because I wasn't personally involved in
21 dealing -- no decisions were made at that point, so I
22 was not taking notes about the case at that point.

23 Q. Okay. Do you remember whether the discussion
24 involving my client resulted in the creation of a
25 threat assessment?

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1 MR. PORTER: Objection, foundation.

2 BY MR. FLORES:

3 Q. Was one of the tasks that the behavioral intervention
4 team was responsible for, was one of those tasks, did
5 that involve sometimes creating a threat assessment
6 with respect to a student?

7 MR. PORTER: I'm sorry, I just want to
8 understand the question. Are you just speaking
9 generally as a typical matter?

10 MR. FLORES: Yeah, just generally with
11 respect to the BIT right now.

12 A. It depends on the type of situation it is and what's
13 coming into BIT and what you mean by risk assessment.
14 Official risk assessment versus us discussing risk,
15 that's two different things.

16 BY MR. FLORES:

17 Q. Okay. So on the WSU website, the information about
18 the behavioral intervention team lists as one of the
19 tasks that it may do is the creation of a threat
20 assessment.

21 A. Mm-hmm.

22 Q. Can you tell me what that involves, if you know?

23 A. So if it goes beyond us, then we would get different
24 campus partners involved in terms of where the risk is
25 and who needs to be involved, getting general counsel

involved to make sure we're making the best decisions depending on where the scenario is taking place or what the issue is. Something can be of a counseling matter, something could be of a housing matter, we just -- it depends on the case.

Q. So do you remember whether on that date as it pertained to my client there was any discussion of a threat assessment being created?

MR. PORTER: I will object and instruct the witness not to answer if it requires her to divulge any communications that are protected by attorney-client privilege. But if it does not, then you can answer the question.

A. I will just say I don't remember at this point.

BY MR. FLORES:

Q. I'm going to just go down the list of the different representative offices because I know sometimes not everybody shows up at the meeting. They may send a colleague or no one may show up. To the extent that you remember, do you remember who attended on behalf of the dean of students?

A. The dean of students.

Q. Do you remember whether the associate dean of students and student conduct officer -- would that have been you who attended --

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1 A. Yeah, I'm the conduct officer, yep. That would have
2 been me.

3 Q. Do you know who attended on behalf of the director of
4 counseling and psychological services?

5 A. Yeah, Jeff.

6 Q. Do you know a last name?

7 A. We can submit -- Jeff Kuentzel.

8 Q. Okay. Do you know who attended on behalf of the
9 director of student disability services?

10 A. Randie Kruman.

11 Q. Do you know who attended on behalf of the office of
12 general counsel?

13 A. Would have been Linda Galante at that time.

14 Q. Do you know who attended on behalf of the director of
15 the office of housing and residential life?

16 A. I think -- I don't remember her last name, but Janine.
17 It may have been Janine. Janine was leaving the
18 institution, so I don't remember the date she left,
19 and then they were hiring, so I -- it would have been
20 her if there was somebody.

21 Q. And do you know who attended on behalf of the crime
22 prevention section of the police department?

23 A. Yes, Lieutenant Scott.

24 Q. Do you remember during that meeting any discussion of
25 information that had been provided by Dean Chadwell?

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1 MR. PORTER: Objection. Instruct the
2 witness not to answer if it requires you to divulge
3 communications that are protected by the
4 attorney-client privilege. To the extent that it does
5 not, you are free to answer.

6 THE WITNESS: I'm going reserve my -- not
7 answer.

8 BY MR. FLORES:

9 Q. I'm sorry?

10 A. I'm not going to answer.

11 MR. PORTER: I think based on my
12 instruction, she's decided that she cannot answer that
13 question?

14 MR. FLORES: And, obviously, I'm not
15 agreeing to that claim of privilege, David. We'll
16 deal with it later.

17 BY MR. FLORES:

18 Q. Do you know whether or not any discussion took place
19 involving information received from Loretta Robichaud?

20 A. I -- I don't recall.

21 Q. Did you make any record of having reviewed the
22 complaint involving my client at the BIT, any notes,
23 any other writings?

24 A. Me personally, no.

25 Q. And as a result of the BIT, did there come a time that

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1 they assigned the complaint to you for investigation?

2 A. There was a time where I was informed that I should be
3 the person to speak to the complainant and to speak to
4 the respondent.

5 Q. Was any other conduct officer or person in a similar
6 position to you assigned to work with you on this
7 case?

8 A. No.

9 Q. And was that standard operating procedure because of
10 the size or the nature of the complaint?

11 A. I'm the only student conduct officer at the
12 university.

13 Q. But there are other investigators that are part of
14 your office; is that correct?

15 A. The dean of students office? No. There's nobody with
16 the title called "investigator."

17 Q. So there are no other -- other than yourself, there
18 was nobody else, unless it was going to be referred to
19 the police department, who could do any kind of
20 investigation; is that correct?

21 MR. PORTER: Objection. Are you referring
22 to just this specific case? Or any case.

23 MR. FLORES: This specific case.

24 A. As far as I know, the decision was that I should be
25 the person to deal with the case.

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1 BY MR. FLORES:

2 Q. And who made that decision?

3 MR. PORTER: I would object and instruct
4 the witness not to answer if it requires you to
5 divulge attorney-client privileged communications, but
6 to the extent that it doesn't, you are free to answer.

7 A. I will just say it was determined that I should be the
8 one to meet with the students.

9 BY MR. FLORES:

10 Q. Were you given a timetable in which to do that?

11 A. No, I wasn't given any specifics of a timetable other
12 than to typically do what we normally do and do our
13 best to schedule meetings and contact the -- both
14 parties and do our best depending on our schedule.

15 Q. Did you handle that matter in the same way that you
16 handle other investigations?

17 MR. PORTER: Objection, form.

18 A. I'm not sure I understand your question.

19 BY MR. FLORES:

20 Q. Had you ever received direction to handle a particular
21 conduct investigation at a previous meeting of the
22 BIT?

23 A. Well, at that time, I was new to Wayne State, so I
24 would not have been asked to because it was my first,
25 you know, because of the nature of me, you know,

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starting that semester for the first time.

Q. Okay. Were you given any guidance by the BIT in terms of how you should handle this matter?

MR. PORTER: Objection. Based on attorney-client privilege, I would instruct you not to answer if it requires to you divulge attorney-client privileged communications, but to the extent that it doesn't, you are, obviously, free to answer.

BY MR. FLORES:

Q. Can you answer that question?

A. I'm not going to comment, no.

MR. FLORES: For the record, I'm taking an exception to that claim of privilege.

BY MR. FLORES:

Q. After you received, read, and discussed the complaint at the meeting, did you receive any other instructions from anyone else after the meeting as to how to handle the investigation?

A. No. I was just asked to meet with both students and gather the statements and forward them onward and not to make a determination in the case.

Q. Okay. I just want to make sure that I understand. Your responsibility was to talk with both parties, correct?

A. Mm-hmm.

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1 Q. Could you answer just "yes" or "no" for the record?

2 A. Oh, sorry, yes. Sorry, yes.

3 Q. And once you'd taken their statements to submit a
4 report?

5 A. Yeah. The -- not only the statements but also if
6 there's any evidence for them to share and to document
7 that and submit it forward.

8 Q. But you were told not to make a determination as to
9 who was right or wrong or --

10 A. Right.

11 Q. -- who was truthful or not truthful?

12 A. Right, I was not to make a determination; that was not
13 my role in this matter.

14 Q. Okay. And then who did you forward your report to?

15 A. So the final report was emailed to Margit Chadwell,
16 Linda Galante, and also the respondent.

17 Q. Ms. Galante was general counsel?

18 A. Yes.

19 Q. And the -- I'm sorry, so it was to Dean Chadwell, to
20 general counsel's office, and then who else?

21 A. The respondent.

22 Q. So that would have been my client?

23 A. Yes.

24 Q. Were you directed by anyone not to investigate the
25 case beyond taking statements?

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1 A. No.

2 Q. And after getting the -- after having the conversation
3 with the complainant and getting copies of text
4 messages, did you do anything to corroborate or
5 disprove any of the complainant's account?

6 A. Just confirming the student's status, you know, that,
7 you know, like what she was studying and confirming
8 she, obviously, that she was a student, but no.

9 Q. At the time that you spoke with her in October of
10 2018, was she still a student at WSU?

11 A. No --

12 MR. PORTER: Objection, foundation. Did
13 you say October or November?

14 MR. FLORES: I said October of 2018.

15 A. I believe she was not a student at the time.

16 BY MR. FLORES:

17 Q. Do you know how long -- did you come to learn how long
18 she attended Wayne State?

19 A. I don't recall off the top of my head, but I recall
20 possibly that she would have left Wayne State soon
21 after filing the complaint. I mean graduated.

22 Q. She started as a freshman in 2016.

23 A. Okay.

24 Q. I'm just giving you that information. Typically, she
25 would have graduated after four years, which would

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1 have placed it 2020.

2 A. I should correct myself, I moved on from the
3 university.

4 Q. Oh, so your departure?

5 A. No, no, I'm saying her departure from the university.
6 So she was not a student at the time.

7 Q. Okay. So at the time she made the complaint, she was
8 not a student?

9 A. Right.

10 Q. And you don't know, as you're sitting here today, when
11 she was -- when she left the school after starting in
12 2016?

13 A. I would have to look at my records that's -- to gather
14 that information.

15 Q. At the time that you spoke with the complainant, do
16 you know where she was located?

17 A. Yeah, she was out of state.

18 Q. Do you know what state she was in?

19 A. I believe, if I recall, I'd have to check, but I think
20 she said she may have been in Colorado.

21 Q. And --

22 A. But I would have to check.

23 Q. I'm sorry, could you repeat that answer for the
24 record?

25 A. Yeah, I would have to check because I don't remember,

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1 it was so long ago, I would just have to check, but I
2 know that she was out of state.

3 Q. And at the time that you interviewed her by telephone,
4 did the school have access to a videoconference?

5 A. It wasn't something we used, and so I didn't use
6 videoconferencing with her, with the complainant.

7 Q. So you were not able to see any facial expressions or
8 who else might have been in the room with her while
9 she was talking to you; all of that information was
10 not available to you?

11 A. Well, I didn't see her on video. I just spoke to her
12 over the phone.

13 Q. So you did not know if there was anyone in the room
14 with her while you were talking with her?

15 A. Yeah, I wouldn't have been able to see.

16 Q. And you didn't -- did you ask her whether or not there
17 was anyone there when she was talking to you?

18 A. I don't recall asking her because the meeting was just
19 between me and her, but I don't remember her saying
20 that there was anybody else in the room. I believe
21 she was the only one on the phone at the time, and I
22 didn't hear anyone else commenting or making noises
23 during our conversation.

24 Q. Okay. How -- let's go back and talk now about your
25 contact with my client.

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1 A. Mm-hmm.

2 Q. Normally, you said you would have an electronic
3 message sent to the student informing them that there
4 was a letter for them; is that correct?

5 A. No.

6 Q. How would you normally --

7 A. I would send them a letter via Maxient software
8 inviting them to meet with me.

9 Q. In this particular case, however, you sent to my
10 client a note from the dean of students informing him
11 that there was a letter waiting for him from the dean
12 of students; do you remember that?

13 A. No.

14 Q. Just give me a moment.

15 A. I -- yeah. That's probably electronic information
16 coming from Maxient letting the student know there's
17 an electronic letter from the dean of students office
18 that they have to sign into. Once they sign in with
19 their banner ID, they can open the letter that I would
20 have sent electronically. So I think that's what you
21 might be referring to is the automated message that
22 all students get from me via Maxient software.

23 MR. FLORES: Okay. Let me just -- Bailey,
24 if you would put on the screen **Exhibit F**, please.

25 EXHIBIT TECHNICIAN: One moment.

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INTRODUCED FOR DISCUSSION:

EXHIBIT F

1:11 p.m.

BY MR. FLORES:

Q. And if you would go to the second page. Scroll down to the bottom half.

A. Yep, that's from Maxient. That's automatic messaging from Maxient.

Q. And your letter to them triggers that because you send it through the Maxient system?

A. Correct, so anything coming out of the dean of students office. It lets the student know that it's coming from the dean of students office.

Q. Okay. Why don't you just leave that up there for just a second so I can ask some related questions.

Now that email from the -- via Maxient goes to the student's student email address; is that correct?

A. Correct.

Q. And does it come with a flag or some type of attention grabbing symbol to let the student know that they've got an important piece of correspondence from the dean's office?

A. It just comes to their email. As far as I know, it comes to their email.

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1 Q. And it looks the same as any other email?

2 A. It will say it's from Maxient software. It will say
3 Maxient in the subject header.

4 Q. But it's not flagged as "Attention" or flagged as
5 "Important" or "Immediate Request"?

6 A. No, it's --

7 Q. There's no --

8 (Attorney and witness speak over each
9 other.)

10 Q. -- attached to it is my question.

11 A. Yeah, Maxient doesn't give you the option to put an
12 alert on the email --

13 Q. Okay.

14 A. -- to, like, ping a student, or something like that,
15 that would alert them in the email, but it will say
16 the subject -- that's the subject header, "Official
17 Correspondence From the Dean of Students Office."

18 MR. FLORES: Okay. And if you would,
19 Bailey, put up **Exhibit G**.

20 EXHIBIT TECHNICIAN: One moment.

21 INTRODUCED FOR DISCUSSION:

22 **EXHIBIT G**

23 1:14 p.m.

24 MR. FLORES: Okay. If you could just show
25 that, just scroll through that slowly. Just stop

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1 at -- yeah, put the text in the middle.

2 BY MR. FLORES:

3 Q. Ms. Camaj, that is the letter that you wrote to
4 Anthony?

5 A. Mm-hmm. Yes, sorry, I should say yes.

6 Q. And what was the stated purpose for the meeting?

7 A. To discuss concerns reported about alleged behavior on
8 Wayne State University's campus.

9 Q. And at the time that you sent that, did you also
10 include a statement of the charges for the complaint?

11 A. There were no charges filed in this case, so I
12 wouldn't have included charges because there was no
13 charges filed.

14 Q. Did you provide my client with a statement of why he
15 was being -- the purpose for the fact-finding
16 conference?

17 A. No, because I'm not required to, and -- and I just
18 included in there I wanted to discuss reported
19 concerns.

20 Q. So you're telling me that under the Student Code of
21 Conduct, you had no responsibility to advise him of
22 what he was going to be meeting with you about?

23 A. This is not a Student Code of Conduct case because no
24 charges were filed in the matter, in this matter, I
25 should say.

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1 Q. Okay. Even though that the letter says it's a -- the
2 matter involves a violation of the Student Code of
3 Conduct?

4 A. It says it may, and the information that was in the
5 complaint could have resulted in such and that's the
6 reason I wanted to discuss this concerning behavior.
7 It didn't say it did, it said may have.

8 Q. Well, this just seems to be an effort to make sure
9 that he had no idea why he was going to meet with you.

10 MR. PORTER: Objection, form.

11 A. That's not the intention. It's to get the student in
12 my office to discuss concerning behaviors that have
13 been reported to our office, and that's typically what
14 I do. I'll invite students to meet with me to discuss
15 concerning behaviors, and then I let them know the
16 information when they meet with me, and it's not a
17 conduct case, so I'm not required to share anything
18 further.

19 BY MR. FLORES:

20 Q. Why wasn't this a conduct case?

21 A. Because no charges were filed.

22 Q. When you say "charge," can you define how you're using
23 that term?

24 A. Sure. In the Code of Conduct, it indicates that
25 charges can be filed against the student, and that's

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1 the Code of Conduct term, and so if I'm informed that
2 someone on campus -- or has alleged to have -- excuse
3 me. If somebody on campus is alleged to have violated
4 the Code of Conduct, and somebody wants to file
5 charges, they can contact our office and file charges.
6 In this case, no charges were filed.

7 Q. So your testimony is that Jane Doe's complaint was not
8 the filing of a charge against my client?

9 A. Right. If it was -- if it was, it would have been
10 indicated in the letter.

11 Q. And what additional step would the complainant have to
12 have taken to turn her complaint into a charge?

13 A. Notify me that she wanted to pursue a charge. They
14 just -- anybody who wants to file a charge just needs
15 to let me know that that is what they intend -- that
16 that is what they want.

17 MR. FLORES: Bailey, if you would please
18 publish **Exhibit E**.

19 EXHIBIT TECHNICIAN: One moment.

20 INTRODUCED FOR DISCUSSION:

21 **EXHIBIT E**

22 1:19 p.m.

23 BY MR. FLORES:

24 Q. And go to page 3. Do you see that paragraph that
25 starts with "Complaint" --

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1 A. Mm-hmm.

2 Q. -- Ms. Camaj?

3 A. Mm-hmm.

4 Q. Okay. And then goes to the next page and stop there.

5 Do you see what the -- there's a question
6 there that reads "What is the outcome you are
7 requesting?"

8 A. Mm-hmm.

9 Q. Could you read that to yourself and let me know when
10 you're done?

11 A. Okay.

12 Q. And so is it your testimony today that in spite of the
13 fact that she asked to have my client held accountable
14 and that he be reprimanded, that this is not a request
15 for him to be charged with having harassed her; is
16 that your testimony?

17 A. My testimony is that charges were not filed with me.

18 Q. Were they filed with anyone else?

19 A. Not at the time, nope. Nobody -- no one filed charges
20 against your client.

21 Q. Did there come a time that charges were filed against
22 my client?

23 A. No, and if charges were filed, your client would have
24 been notified.

25 Q. So is it your testimony that the complainant did not

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1 want any action to be taken against my client?

2 MR. PORTER: Objection, form.

3 A. My testimony is that charges were not filed.

4 BY MR. FLORES:

5 Q. Have you had a chance to read that section under the
6 question "What is the outcome you are requesting?"

7 A. Yes.

8 Q. Can you tell me what you believe Jane Doe is
9 requesting?

10 A. She's requesting some type of action against the
11 respondent.

12 Q. And can you please tell me what that action is?

13 A. She says a reprimand.

14 Q. And is there something that, you know, within the
15 Student Code of Conduct that would meet the definition
16 of a reprimand?

17 A. Yes, under section 5.0, it can be determined that a
18 student is held responsible with the sanction of
19 disciplinary reprimand.

20 Q. And in talking with the complainant on November 15th,
21 did you discuss holding my client accountable for what
22 she alleged was done?

23 A. We discussed her complaint, and we discussed her
24 wishes that he be held accountable. She didn't
25 specify to which level the accountability needed to

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1 take place, but at this -- at that point, no charges
2 were filed.

3 Q. So she did not ask to have him dismissed from school
4 or expelled?

5 A. The word "expelled" was never used with me.

6 Q. Did she ask to have him removed from the school?

7 A. That was never said to me.

8 Q. Did she ask that he should be suspended from the
9 school?

10 A. That was -- I can't recall her saying that. I just
11 can't recall that ever being said.

12 Q. Okay. Let me go back. At the time that you were
13 asked to handle this complaint, you had been employed
14 at Wayne State for approximately three months; is that
15 correct?

16 A. Yes, I started in July, yes.

17 Q. And between the time you were hired and the time that
18 you took on this complaint, how many other complaints
19 had you adjudicated or worked on?

20 A. I did not adjudicate this case, but I had worked on
21 other cases. The number I cannot recall, but I had
22 worked on other cases.

23 Q. Do you think it was more than ten or less than ten?

24 A. It would have been less than ten just because of the
25 timing. Because school may have started at the end of

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1 August, early September that year, I'd have to check
2 the records. So obviously, if I'm asking somebody to
3 meet with me in October or November, it wouldn't have
4 been that many cases at that time.

5 Q. So you invited my client to meet with you on -- as a
6 result of the complaint --

7 A. Mm-hmm.

8 Q. -- that had been made, and he wrote back to you.

9 MR. FLORES: If you would -- Bailey, if you
10 would publish Exhibit H.

11 EXHIBIT TECHNICIAN: One moment.

12 INTRODUCED FOR DISCUSSION:

13 EXHIBIT H

14 1:26 p.m.

15 BY MR. FLORES:

16 Q. If you could take a look, Ms. Camaj, at the email
17 above the line.

18 A. Uh-huh, yes.

19 Q. And tell me what that date is stamped on that email.

20 A. November 27th, 2018.

21 Q. And can you determine whether that was an email from
22 my client to you or from you to my client?

23 A. That would have been from the respondent to me
24 according to his -- to what you're showing me.

25 Q. And I'm going to ask the question "What is this

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1 fact-finding session regarding?"

2 And you -- and he followed it up with a
3 statement saying that he was not aware of any Code of
4 Conduct charges that were filed against him. Do you
5 remember whether you responded to that email?

6 A. I don't recall. I do my best to respond to students.
7 I do get lots of emails throughout the day as I am a
8 person who receives a lot of CARE reports and conduct
9 reports and correspondence from faculty and students.
10 So it would have been one where if I didn't respond,
11 it wouldn't have been my intention not to respond, I
12 just don't recall.

13 Q. Okay. Let's see if we can refresh your recollection a
14 bit.

15 MR. FLORES: If you would publish Exhibit
16 F, please, Bailey.

17 EXHIBIT TECHNICIAN: I believe we have F
18 up, I'm sorry.

19 MR. FLORES: And go to the top of that
20 page. Okay, right there.

21 BY MR. FLORES:

22 Q. Would you go ahead and read that email to yourself,
23 Ms. Camaj, and then let me know when you're done.

24 A. Okay.

25 Q. Based on that email, does it help you remember whether

1 or not you responded to the 11/27 email that we
2 previously viewed and discussed?

3 A. No, it -- I just really don't remember, and again,
4 it's never my intention not to respond to students as,
5 you know, when I make meetings, I typically will
6 respond if they do correspond with me, and the only
7 reason why I could assume why I maybe would have
8 missed it was just because of the number of emails
9 that I would have gotten at that time, but I really
10 don't recall.

11 Q. All right. If you take a look at this, the part of
12 that email that starts with section 11.2, is it your
13 testimony that you had no obligation to provide this
14 information because no charges had been filed?

15 A. No. My testimony is that I'm not required as it's not
16 a Code of Conduct matter, and so I typically tell
17 students I'd like to discuss their concerning
18 behavior, that's just been my practice over the years.
19 I don't write in my email typically all the details of
20 what my concerns are because I want to meet with them
21 in my office and discuss the concerns in person, and
22 again, this was not a Code of Conduct charge.

23 Q. So this was -- how would you describe this matter?

24 A. This was -- this was a complaint and -- about
25 concerning behavior that I was asked to speak to two

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sides with and then submit a report with the
statements that were provided to me.

Q. So charges and a concerning behavior complaint, those
are two distinct things in your mind?

A. No. Yes, they are different. It's not in my mind,
it's the specification of my job that when charges are
filed, I have to tell the student that charges have
been filed against them. That's my duty and my
position. But if charges were filed, I don't have to
submit any further information.

Q. Based on your training and your time at WSU, would it
have been possible for the university to press charges
using as its basis the complaint received by the -- or
based on the complaint made by Jane Doe?

A. Do you mean filed charges?

Q. Could the university have filed charges based on that
complaint?

A. Yes, anyone in the university can file charges at any
time. Typically, it wouldn't be me because I'm the
conduct officer, but anyone is permitted to file
charges.

Q. And in your -- based on your training, there was
sufficient information in that complaint to justify a
charge; is that correct?

A. That's not what I said.

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1 Q. I'm asking you a new question.

2 A. Yes.

3 Q. Based on your training, was there sufficient
4 information in that complaint to justify a charge?

5 MR. PORTER: Objection, form.

6 A. It's not for me to determine who should file charges.
7 It's for me to answer questions to the person who
8 wants to file charges if that's what they wish to do
9 and, you know, and, again, provide those who want to
10 file charges the information of how they can do it and
11 how it would be proceeded.

12 BY MR. FLORES:

13 Q. Let's try this as a hypothetical.

14 Suppose I was the complainant in this case,
15 and I called and you and I had a conversation, and you
16 asked me "Do you want to file charges," and I said
17 "Yes," what would you tell me to do?

18 A. I would ask you to submit a report, and I would send
19 you the link or advise you to go to the DOSO website
20 and complete the nonacademic misconduct reporting
21 form, and that way you can still inform me which
22 charges -- our form lists all the possible violations
23 in 4.0 that can be selected, and then I would ask you
24 to submit that form, and if you should have technical
25 errors, you could always send me an email with the

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list of charges.

Q. If you -- based on the list of possible charges, had she gone and filled out that form, what charges would be sustainable on the basis of the information contained in her complaint?

MR. PORTER: Objection, form and foundation.

A. Again, I'm not the one who chooses the charges. So she would have had to choose the charge that would have been relevant to this case.

BY MR. FLORES:

Q. And I'm asking you tell me what charges that are listed would be satisfied by the information in the complaint?

MR. PORTER: Objection, form and foundation.

A. It would depend. It would depend on the use of technological resources, so did the student send the text messages while they were on campus? Was -- were they using any of the computers on, you know, the internet while they were on campus to send messages to the other student? Was there any issue of harassment on campus during that time?

And then you would look at charges for, possibly, what -- one of the charges that could be

1 selected was the internet charge, and then also --
2 misuse of internet, and then also disorderly behavior
3 could be one. And then if there were threats made in
4 messaging, because at the time of the complaint, I
5 didn't have the text messages, so if there were
6 threatening messages being shared, you could also
7 select section 4.3. So it really depends on what the
8 specifics of the charges are that would be brought
9 forward by the complainant.

10 Q. Thank you. Now in the criminal law, there are charges
11 which are very specific, and there are charges which
12 are general, so you could be charged with disorderly
13 conduct, which incorporates a wide variety of
14 material.

15 MR. FLORES: You can remove **Exhibit F**.

16 BY MR. FLORES:

17 Q. So you have one charge, disorderly conduct. It covers
18 a lot of different types of behaviors, but it's just
19 one charge. You could also charge somebody with grand
20 larceny auto, which is a fairly specific charge
21 because you have to steal a car, it's what you would
22 expect.

23 Charges that are listed in section 4 of the
24 Student Code of Conduct, those are set forth with some
25 specificity; are they not?

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1 A. Sure. They're set forth to, you know, to reflect what
2 could be possible campus violations.

3 Q. And they include a definition?

4 A. Right.

5 Q. In this case, you're telling me there was no charge
6 that was filed because this was a conduct, an
7 investigation into conduct, not an -- not an
8 investigation into a specific charge; is that right?

9 MR. PORTER: Objection, form. It misstates
10 her prior testimony.

11 BY MR. FLORES:

12 Q. And what was your --

13 A. In my letter, it specifies that I was going to be
14 meeting with the respondent about some concerning
15 behavior that was reported to our office. So it was
16 about --

17 Q. Concerning --

18 A. Concerning behavior, correct, that was reported to our
19 office that we needed to get more information on.

20 Q. Okay. Thank you for refreshing my recollection. That
21 was the phrase I was searching for, "concerning
22 behavior."

23 Is that defined anywhere in the Student
24 Code of Conduct?

25 A. No, because, again, it's not a charge.

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1 Q. Is it described, to your knowledge, in any policy
2 statement or regulation or rule that the university
3 has published?

4 A. Not that I'm aware of.

5 Q. So when you hear the term "concerning behavior," will
6 you give me your definition of that phrase?

7 A. Yeah. You might be doing something that's concerning
8 to the greater community, it could be concerning to
9 your person, like maybe you are hurting yourself
10 individually, you are hurting others on campus, or
11 somehow your behavior is impacting others, it could
12 be -- it's very broad, so just concerning behaviors
13 that could be an issue that we want to, you know,
14 figure out what's going on. So it's very broad.

15 Q. So did there come a time where my client finally had a
16 chance to meet with you?

17 A. Yes, he did meet with me.

18 Q. And do you remember what date that was?

19 A. It would have been in my report that I would have
20 indicated. I don't recall off the top of my head, but
21 it would be in the documents.

22 Q. If I told you it was November 30th, would that seem
23 right?

24 A. Possibly, yes, yes, that makes sense.

25 Q. So right near the end of the month?

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1 A. Mm-hmm.

2 Q. And you had received this complaint sometime between
3 November -- October 29th, when it was made, and
4 November 15th, when you talked to her, when you
5 attended the behavioral intervention team meeting, so
6 someplace between the 29th of October and November
7 15th?

8 A. Yeah.

9 Q. So somewhere two weeks later, two and a half weeks
10 later, you finally met with my client?

11 A. Right, yes.

12 Q. And you met with him alone?

13 A. Yes.

14 Q. And you met with him in your office?

15 A. Yes.

16 Q. Do you remember who started the conversation?

17 A. I did.

18 Q. And can you tell me what, if anything, you said to
19 him?

20 A. Yes, the nature of the beginning of my conversation
21 was to inform him that I will be speaking to him about
22 concerning behavior and that this was not a conduct
23 matter that I would be making a determination on and
24 that I would be taking a statement based on concerns I
25 have gotten from a complainant, the complainant, and

1 that I would be forwarding the case to the medical
2 school, and the other piece that I said was I'm trying
3 to remember just going down the line.

4 So after I informed him of what was going
5 to happen, I never shut the door, so I always let the
6 student shut the door, and if the student definitely
7 needs a break, I let them know, but that was the
8 beginning of our conversation in terms of me asking
9 questions, and then we began by me asking him what --
10 does he know the respondent, and what's the nature of
11 their relationship?

12 Q. In a case where you're looking at concerning behavior
13 rather than a charge, even with respect to just
14 concerning behavior, did you have authority at that
15 time to simply address the matter just at your level,
16 or was this case different and you had to send it up
17 to Dean Chadwell?

18 A. It's not what I was asked to do. I was asked to --

19 Q. Okay --

20 (Attorney and witness speak over each
21 other.)

22 A. -- right, so I -- I would not have been able to exert
23 any authority over this matter.

24 Q. So in this particular case, you were simply an
25 information provider and an information collector, and

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1 then you were sending that forward to your boss who
2 was Dean Chadwell?

3 A. Dean Chadwell's not my boss.

4 Q. I'm sorry, Dean Strauss?

5 A. I was moving it forward to Dr. Chadwell and to Linda
6 Galante as requested.

7 Q. So you didn't send it to Dean Strauss?

8 A. No.

9 Q. Okay. That's a little bit out of the normal ordinary
10 course; is that right?

11 A. Well, I typically don't send my outcomes in conduct
12 cases to Dr. Strauss. The code says that I do not
13 have to send him my outcome cases. I only send Dean
14 Strauss the cases that -- my cases when I invite the
15 student to meet with them to make him aware of the
16 charges, but I don't share the outcome with him.

17 Q. Okay. So would you say this was unusual that you were
18 in this role and sending the information you collected
19 to Dean Chadwell?

20 MR. PORTER: Objection, form.

21 A. I don't know about unusual, but it was because of the
22 nature of the timing of my starting there, it would
23 have been one of the first cases I would have done
24 that with just by the pure nature of me being there at
25 that time.

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1 BY MR. FLORES:

2 Q. But was it because you just were inexperienced and
3 they didn't think you could handle that?

4 A. That was not my directive. It's not about my
5 experience being inexperienced in that -- that's not
6 for me to make a determination on. That was not what
7 I was asked to do.

8 Q. The head of the behavioral intervention team was the
9 person who gave you your assignment; is that right?

10 MR. PORTER: Objection based on
11 attorney-client privilege. If it requires you to
12 divulge attorney-client communications, I'd ask you
13 not to answer.

14 A. Okay. I will not answer.

15 BY MR. FLORES:

16 Q. I'm taking an exception to that.

17 Had you ever sent any of your work directly
18 to Dean Chadwell?

19 A. At that time, no.

20 Q. Had you ever sent any of your work to anyone other
21 than Dean Strauss as of that date?

22 A. As of that date, I don't -- I don't remember. But
23 I -- because it was so early on in my time at Wayne
24 State, I don't know that I had any other cases I would
25 have been assigning to anybody, I mean to forward to

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anybody else at the time.

Q. Okay. Are you familiar with the Office of the
Ombudsman?

A. Yes, I am.

Q. And what does the ombudsman's office -- what are they
responsible for?

A. So one of their main purposes, and we include the
ombud's letter in our correspondence to students, to
provide them information about the policies and
procedures at Wayne State University. So they are not
ones to make decisions on cases, like in a conduct
case, but they are ones to provide students
information about proceedings.

Q. And is this --

A. And policies.

Q. I'm sorry.

A. Go ahead.

Q. I didn't hear the last part of your answer.

A. Sorry. They -- I just repeated what I said that they
informed students about procedural matters and
policies.

Q. And in this case, did you refer my client to the
office of the ombudsman?

A. No, because I wasn't required to.

Q. And that was because it wasn't -- there were no

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charges --

A. Correct.

Q. -- it was just a concerning behavior matter?

A. Correct.

Q. Okay. Based on your training, is a matter of concerning behavior more serious or less serious than charges being leveled at a student?

MR. PORTER: Objection, form.

A. It depends on the situation. I've had it where the concerning behavior could be worse based on the students that respond -- excuse me, the student's behavior in the classroom could have been a little more dangerous versus conduct charges, where some conduct charges could have been less. So I've seen both.

BY MR. FLORES:

Q. Did Mr. -- did my client raise any questions with you that you could not answer?

A. If there were any questions about medical school stuff, I would not be able to answer, but I don't recall him asking me that. But if he were to ask me anything about conduct, I would have definitely answered it for him, and especially if he asked me can he -- he asked if he could include an apology letter. I said absolutely you can include that. I informed

1 him he can provide me a statement after our meeting,
2 and he said he would, and I answered questions about
3 how he could send that to me by email. So that's what
4 I can recall at that time.

5 Q. Did you share with him at any point in your meeting
6 that you believed this was a very serious case?

7 A. I don't recall using that word, no.

8 Q. Do you remember -- do you recall what word you might
9 have used to describe this case?

10 A. I don't think I would have described it. I would have
11 said "concerning behavior" because, again, it wasn't
12 for me to make a determination. So I don't know that
13 I would have made a value judgment on the type of case
14 or the seriousness of it.

15 Q. Do you remember having a conversation with him at the
16 beginning where he asked you why you had not answered
17 his emails?

18 A. Possibly. It was so long, I -- I may have told him
19 similar to what I told you where, again, it's not my
20 intention to ignore students.

21 Q. Do you remember telling him that you didn't provide
22 any information because that was your -- your typical
23 strategy, you waited until someone came to your office
24 and then you confronted them in person to see if you
25 could shake their story?

1 A. I would never say that. I don't -- I don't ever
2 remember saying that. Typically, I ask the students
3 to come and meet with me, and then I discuss the
4 concerning behavior that was reported in front of
5 them.

6 Q. Between the time that you spoke with the complainant
7 and you spoke to my client, did you do any independent
8 investigation to either verify or contradict either
9 person's statement?

10 MR. PORTER: Objection, asked and answered.

11 You may answer.

12 A. Okay. So when the complainant stated that text
13 messages were sent, I noticed that I couldn't open
14 them, so I did request that they be sent to me again,
15 and also, when the complainant made her statements in
16 the complaint, itself, I verified that what was said,
17 there was text messages to corroborate as --
18 corroborate as she indicated to see that they matched
19 up.

20 And then waiting, then, I waited to speak
21 to the respondent to confirm that he was in a text
22 message situation with the complainant to confirm that
23 these were sent by him, as well. So that's -- that's
24 all I did is just to confirm that text messages were
25 sent between the two parties.

1 Q. Did you do any work to confirm or disprove any of the
2 allegations pertaining to hacking of my client's
3 computers?

4 A. No, because that's not my expertise, and I recall the
5 respondent mentioning that and us talking about what
6 he did in terms of reporting it to other parties such
7 as C&IT or Apple, I think it was Apple at the time
8 that he was consulting with, and so I -- because
9 that's not my expertise. So I would ask them did they
10 do any work to see who may have hacked them? And then
11 also with the police.

12 Q. Okay. And do you know whether or not Wayne State
13 Police Department or Wayne State's Computer Science
14 Department have forensic specialists that could have
15 done that investigation?

16 MR. PORTER: Objection, form.

17 A. I don't know. I -- our C&IT office is always willing
18 to help students. So if someone has questions about
19 internet and technologies, they could answer basic
20 questions, and then if something's happening on
21 campus, they could look into it, but something
22 external, that would assume that the police would need
23 to be involved. It was, like, an outside source,
24 like, somebody else -- like a Snapchat, which was
25 mentioned, and someone's phones. I would assume that

1 phone companies have resources for that.

2 Q. But you did not ask the Wayne State Police Department
3 or anyone else to verify whether or not my client's
4 claims about being hacked were true?

5 A. Right. Because that would have to come from the
6 companies who owned that software and owned, you know,
7 owned the devices, they would have to check that.

8 Q. But you don't know if the Wayne State Police
9 Department has that capability, do you?

10 A. I don't, and -- because I know typically I refer
11 students, if they have a complaint about a software
12 program, for instance, Facebook, I would state to them
13 to contact Facebook to get more information if your
14 Facebook has been hacked, if that's an issue.

15 Q. But Ms. Camaj --

16 A. And then the police, our Wayne State Police Department
17 can meet with a student and give them more information
18 if they can be of further assistance, but that's not
19 my expertise.

20 Q. Was there anything in the complainant's account that
21 you thought didn't make sense or didn't have the ring
22 of truth to it?

23 MR. PORTER: Objection to form.

24 A. No, there was nothing that was stated that appeared to
25 be made with intent to be false, and so as the -- I

1 read the complaints and spoke with the complainant,
2 the complainant repeated the complaints and then
3 submitted text messages to corroborate the discussion
4 that, excuse me, the text messages between her and the
5 respondent, and so all of that was corroborated by my
6 conversation, by the complainant's report, and the
7 text messages.

8 Q. So when you say you were able to confirm it or
9 corroborate it, what you mean is she did not change
10 her story --

11 A. Right.

12 Q. -- between the time --

13 A. Correct.

14 Q. -- that she filed the complaint and you reviewed it
15 with her?

16 A. Correct. There was no changes in her statement.

17 Q. Did she include in her complaint any reference to
18 other people beyond herself and the accused?

19 A. What do you mean other people?

20 Q. Well, she included information about a photographer;
21 is that right?

22 A. I'm not sure I'm following you.

23 Q. In pictures that were taken, do you remember that?

24 A. Nope. All I -- all I reviewed was text messages.

25 Q. So just give me a moment.

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1 A. Yeah, if you can help me.

2 Q. Yep. I certainly would not expect you to remember all
3 of this just to be clear, and if you need to take a
4 break, please let me know.

5 MR. FLORES: Okay, Bailey, if you would
6 post **Exhibit E**.

7 EXHIBIT TECHNICIAN: One moment.

8 MR. PORTER: Okay.

9 MR. FLORES: Okay. If you can go up a
10 little bit higher, or I'm sorry, go back down to where
11 the complaint starts, I'm sorry. Yeah, go to page 2,
12 yeah, right -- yeah. Keep going. It's the last --
13 okay, right there.

14 BY MR. FLORES:

15 Q. So Ms. Camaj, just to maybe save some time overall, if
16 you would take a look and just reread the complaint,
17 it's pretty short, and then let me know when you're
18 done.

19 A. Okay.

20 MR. FLORES: And can you go to the next
21 page and let her read the second part?

22 A. Okay.

23 BY MR. FLORES:

24 Q. So with respect to -- there was an allegation made as
25 part of the complaint that had to do with some

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1 photographs.

2 A. The pictures?

3 Q. Yeah, pictures. Do you remember that?

4 A. Well, yeah, it's in the complaint. I never received
5 those.

6 Q. Did you discuss it with her at all?

7 A. Well, I asked her to send me anything she had as
8 evidence.

9 Q. Did see send you any photographs or pictures?

10 A. All I can recall her sending me is text messages and
11 possibly -- it's whatever I submitted with my report.

12 Q. Okay. Did you ask her for the name and telephone
13 number of this photographer?

14 A. No.

15 Q. Did you ask or get a telephone number for the alleged
16 law firm that was identified by my client to harass
17 the complainant?

18 A. No.

19 Q. And you did not ever call or make any effort to call
20 the Wolf Smith Law Firm that's listed here in the
21 complaint?

22 A. No.

23 Q. So you simply talked with her, reaffirmed that she was
24 sticking by this complaint, and asked her to resend
25 the text messages?

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1 A. Yeah, because I couldn't open them.

2 Q. Do you remember approximately how long this telephone
3 call took place or lasted?

4 A. I think with each party, it was about an hour, I feel,
5 but I'm not sure, I didn't time it.

6 Q. Do you remember if you talked to her on your cell
7 phone or on your desk phone?

8 A. It would have been my desk phone.

9 MR. FLORES: All right. You can take --
10 you can pull that down. Thank you, Bailey.

11 BY MR. FLORES:

12 Q. Do you remember whether or not the complainant
13 provided any additional facts that were not in her
14 online complaint?

15 A. I don't remember additional facts.

16 Q. And did you take notes as you were talking with her?

17 A. I do both. I type what the statement is coming from
18 the complainant and respondent, and then if I need to
19 make some notes on the actual evidence, like text,
20 I'll print out the text messages, I might make some
21 notes just so that I make sure that I'm referring that
22 I discussed it with them, but typically I'm typing it.

23 Q. And did you take notes in this particular case?

24 A. You mean typing?

25 Q. Yeah, did you do --

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1 A. Yeah, I typed -- I type what the students say, so that
2 way I can make sure I reflect accurately what they've
3 told me in the report.

4 Q. And do you still have those notes?

5 A. No, because once I make sure I have entered everything
6 correctly, I shred everything.

7 Q. And did somebody ask you to do that shredding?

8 A. No, that's just my practice, so I don't -- I typically
9 operate, with everything online, as the Maxient
10 administrator, everything is online for me and saved.
11 So I don't really need to keep paper notes.

12 Q. But there's no way for me now to take a look at your
13 notes and verify that your notes reflect accurately
14 what you put into any other document, is there?

15 MR. PORTER: Objection, form.

16 BY MR. FLORES:

17 Q. If I wanted to verify that your notes were accurately
18 reflected in the complaint or in any other writing,
19 there's no way for me to do that now; is that right?

20 MR. PORTER: Objection to form. You can
21 answer.

22 A. It's my practice to share the final outcome to make
23 sure that I would take my notes and accurately reflect
24 it to the final report, but they would -- I would not
25 share my notes.

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1 BY MR. FLORES:

2 Q. But you're telling -- your testimony today is that
3 your notes no longer exist --

4 A. Correct.

5 Q. -- because they've been shredded?

6 A. Right. Because that's what I typically do if I do
7 have any notes because I wouldn't want anybody to find
8 them or, you know, get ahold of them, and so if I
9 don't need them anymore because I reflected everything
10 accurately on the final report, then I don't need to
11 keep them any longer.

12 Q. But how do I know that?

13 MR. PORTER: Objection, form.

14 A. You'd have to take my word for it and that I've been
15 doing this for 20-plus years, and I, you know, I've
16 always submitted things with the final report when
17 I've been asked to and have tried my best to
18 accurately represent what the students are telling me.

19 BY MR. FLORES:

20 Q. You'll excuse me if I don't take your word for it.

21 A. That's fine.

22 Q. Let's move forward.

23 Do you remember receiving a statement from
24 my client over the weekend or immediately after the
25 meeting as he had promised you he was going to do?

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1 A. Yeah, I -- I do recall -- I was looking for it because
2 he told me he would send it to me as soon as possible.

3 Q. And you attached that to your report?

4 A. Correct, because I told him that any statement he
5 provides to me I would add it to the report as his
6 statement because I told him that, you know, sometimes
7 students aren't able to articulate everything during
8 my meeting, and so they have an opportunity to submit
9 a statement and that I wanted to make sure I reflected
10 that by adding it to the report.

11 Q. Did you do -- did you take any steps to verify or to
12 corroborate or disprove any of the statements that he
13 made in the submitted statement?

14 A. Well, I remember reading it. And then I wanted to
15 make sure I include it along with the report.

16 Q. But because you were not responsible for actually
17 doing an investigation in this case, you didn't
18 attempt to verify or check the veracity of his
19 statement?

20 A. I would check his statement by asking him questions
21 on, like, during our meeting, and then some of the
22 technical stuff like phone -- the phone stuff, I
23 wouldn't have been able -- that wasn't my expertise to
24 check the hacking.

25 Q. And you didn't ask anybody else whose expertise -- who

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1 had expertise in that area to make that --

2 A. No, no.

3 MR. FLORES: I'm just trying to see if we
4 can skip over what we've already talked about. Sorry,
5 David. Sorry, Ms. Camaj.

6 THE WITNESS: No worries, no worries.

7 MR. PORTER: That's fine. If you need to
8 take a break, let us know.

9 MR. FLORES: We're already at 2:00, huh?
10 Let's take a ten-minute break and that way...

11 (Witness and both counsel speaking over
12 each other.)

13 (Recess taken at 2:05 p.m.)

14 (On the record at 2:15 p.m.)

15 BY MR. FLORES:

16 Q. If we can -- okay, Ms. Camaj, to be clear, because
17 this was an inquiry into concerning behavior, you did
18 not have the responsibility of investigating the
19 different claims being made by the complainant and my
20 client; is that correct?

21 A. I -- yeah, I was there to take their statement
22 information, and if I could figure information out, I
23 should definitely do so if I had the ability to.

24 Q. But this wasn't a case where you were charged with
25 going out and trying to collect evidence and trying to

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1 resolve the matter?

2 A. Right. I was not asked to resolve the matter, to
3 gather data.

4 Q. And as a result of confirming the complaint, you did
5 not find any evidence that my client sent the
6 complainant any inappropriate pictures?

7 A. I was not sent any evidence. Not that I didn't find.
8 I was not sent anything.

9 Q. Right, so -- but no -- no evidence of my client
10 sending inappropriate pictures to the complainant were
11 discovered by you, collected by you, or in any way
12 assembled by you that you included and just -- I don't
13 see them in the report so they didn't --

14 A. If I would have received them, I would have included
15 them. Anything I received from both parties, I made
16 sure to include whether it was a statement, a letter,
17 or text messages.

18 Q. Excellent. And did you discover any obscene speech
19 made by my client?

20 A. What do you mean, "discover"?

21 Q. Did you come across it? Were you provided with
22 obscene messages?

23 A. I was only provided the text messages.

24 Q. So the answer would be no?

25 A. It depend on the definition of obscene, but I don't --

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1 I don't recall him calling her any kind of name or
2 saying anything obscene, as you would say.

3 Q. Now, the result, again, is that you only collected
4 information and confirmed the complaint?

5 A. I collected the information, and I shared everything I
6 gathered with the parties that I've specified.

7 MR. FLORES: I would like you, Bailey, if
8 you would, publish Exhibit E again, please. Just the
9 first full page, not the title page.

10 EXHIBIT TECHNICIAN: One moment.

11 MR. FLORES: You can go all the way up to
12 the top. Yeah, that page right there, right there.

13 BY MR. FLORES:

14 Q. Would you read into the record, Ms. Camaj, from "Dear
15 Margit," to your -- the conclusion?

16 A. "I have concluded my investigation into the
17 complainant -- complaint made on October 29th, 2018,
18 against WSU medical student, Anthony Eid, by former
19 WSU student, Amanda Burton. Attached you will find
20 the investigation report, statements and evidence."

21 Q. Okay. So even though all you did was you collected
22 the information and confirmed the complaint and
23 forwarded it along, you created a document which would
24 lead the reader to believe that you actually conducted
25 an investigation; is that true?

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1 A. I created a document to show that I investigated the
2 complaint and spoke to the respondents.

3 Q. But you didn't investigate the complaint, did you?
4 You didn't independently try to verify, you didn't
5 collect names, you didn't ask for information, you
6 didn't try to shop talk with witnesses, you didn't do
7 any of those things because by your testimony today,
8 that was not what you were charged to do?

9 MR. PORTER: Objection to form.

10 BY MR. FLORES:

11 Q. Am I correct that that was not your portfolio of
12 responsibilities?

13 A. Yeah, what I was asked to do is speak to both parties
14 and gather as much evidence as I can that was
15 submitted to me.

16 Q. And is that an investigation?

17 A. It can be.

18 Q. Your testimony is that in collecting that information
19 and not independently verifying it or engaging in any
20 other activity, that's what constitutes an
21 investigation in this case where my client is now out
22 of school and may never practice medicine? That's
23 your testimony?

24 MR. PORTER: Objection, form,
25 argumentative.

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1 A. That's not what I said.

2 MR. FLORES: I'll withdraw it.

3 BY MR. FLORES:

4 Q. Is there a reason that you waited so late to contact
5 my client and ask to meet with him?

6 A. No, it would have just been my scheduling because I
7 have my calendar, and if I -- my calendar is booked,
8 then I would have delayed the meeting, but there was
9 no ill intent to delay the meeting at all.

10 Q. And you submitted that report on December 4th, 2018;
11 is that correct?

12 A. Yeah, that's the date on the report.

13 Q. And do you remember what day of the week that was?

14 A. I don't. I would have to check the calendar; I don't
15 remember.

16 Q. Do you remember if you worked the full month of
17 December?

18 A. What do you mean? Like was I in the office?

19 Q. Were you in the office? Did you take off for
20 Christmas break?

21 A. I believe I was, I -- all of us have the same
22 Christmas break at Wayne State, so it would have
23 started on the 23rd or 22nd, because I usually take my
24 time off when most students take time off. So that
25 would have been that week where we get off for Wayne

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1 State.

2 Q. All right. Now, how did you transmit your report to
3 Dean Chadwell?

4 A. Maxient.

5 Q. And he is not at the university but in the medical
6 school; is that correct?

7 MR. PORTER: Objection, form.

8 BY MR. FLORES:

9 Q. Do you know where Dr. Chadwell works?

10 A. Yeah, if you look at her letterhead -- if you look at
11 the letter, it says that she's at the University
12 School of Medicine.

13 Q. And so that system can send information from the Dean
14 of Students Office anywhere in the university; is that
15 correct?

16 A. The Maxient software has email capabilities, and then
17 you can send emails to anybody that you choose to send
18 emails to.

19 Q. And that's how you communicated, and that's how you
20 sent this particular report?

21 A. Yes.

22 Q. And did that report include the attachments, the text
23 messages?

24 A. Yes, it should have included everything. I believe it
25 did. There should be about 11 to 12 pages of text

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1 messages that I should have included. Some of it may
2 have been repeated, but all of them should have been
3 there.

4 Q. After you sent the report to Dean Chadwell, did you
5 have any direct communication with her by telephone or
6 in person?

7 A. No, because my role was done.

8 Q. Did you ever talk with Dean Jackson at the medical
9 school?

10 A. Not about this case, nope.

11 Q. How about Dean Richard Baker?

12 A. No.

13 Q. Did you ever speak with Loretta Robichaud about this
14 case?

15 A. No.

16 Q. Did you ever talk to Jane Doe's mother?

17 A. No, I did not.

18 Q. Do you know whether or not Jane Doe provided
19 information to anyone at the university?

20 A. I don't. I just -- what I know is I got the -- we
21 reviewed the complaint, so I don't know what else
22 happened after that. After I submitted my report, I'm
23 not involved in the case.

24 Q. When you joined Wayne State your first year, you were
25 a student conduct officer, not a Title IX

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investigator; is that correct?

A. Yes.

Q. Nevertheless, did there come a time that you became aware that there was an investigation by the Department of Education's Office of Civil Rights of the WSU Medical School for retaliation against a female student?

A. It may have been spoken about in front of me in the meetings that I was, but I was never part of that discussion and had no knowledge of the proceedings.

Q. As a Title IX investigator, though, are you aware that an investigation by the Office of Civil Rights is a serious matter?

MR. PORTER: Objection, form.

A. Yes, I am aware.

BY MR. FLORES:

Q. And during your time working for WSU in any capacity, did you ever have an occasion to speak to an investigator from the Office of Civil Rights from the Department of Education?

A. No.

Q. Are you aware that at the conclusion of the Office For Civil Rights' investigation, they found by a preponderance of the evidence that the School of Medicine had, in fact, retaliated against that female

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1 medical student by expelling her?

2 MR. PORTER: Objection, form.

3 A. No, I don't know the details of the case.

4 BY MR. FLORES:

5 Q. Did you ask -- did you ever ask the complainant for an
6 opportunity to speak to her mother or her father?

7 A. No.

8 Q. And even though she stated in her complaint that she
9 had recently talked to her parents about this matter,
10 you made no effort to speak to them?

11 A. No, I did not contact the parents.

12 Q. Because there was no charge in this case for you to
13 investigate, and my client was being -- the inquiry
14 focused on concerning behavior, did my client have an
15 obligation under the school conduct code to meet with
16 you?

17 A. Again, this was not a conduct matter so --

18 Q. So the answer would be no?

19 A. Right:

20 Q. Did you tell him that he had no obligation to meet
21 with you?

22 A. No, I don't typically say that to students, they have
23 no obligation. That's just not language that I use.

24 Q. Well, is there some language that you could use to
25 communicate that?

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1 A. It's just not something that I -- I do.

2 Q. Of course not.

3 A. Right.

4 Q. Because if you told them that, they didn't need to
5 come and talk with you, many of them would not; is
6 that right?

7 MR. PORTER: Objection, calls for
8 speculation.

9 MR. FLORES: Withdrawn.

10 BY MR. FLORES:

11 Q. And your testimony is that after you submitted that
12 report on December 4th, you had no further contact or
13 anything to do with this case, and you had no
14 conversations with anyone, including anyone in the
15 general counsel's office or counsel for the
16 university?

17 A. Yeah, I had no further involvement in the case. I
18 don't even know what was decided or the outcome. So
19 I, again, I was only there to investigate.

20 MR. FLORES: Okay. All right, well,
21 Ms. Camaj, I -- this is a serious matter, and if I was
22 a little too aggressive, I apologize, I didn't mean to
23 do that; it's the nature of the process sometimes.

24 David, I want to thank you for your
25 cooperation here. We should probably have an

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1 off-camera discussion. I can't do that until Friday
2 since I'm going to apparently do -- I'm going to be
3 handling the deposition tomorrow. So I've got to get
4 preparing for that, but if we can set aside, if you
5 can let me know Friday what might work for you in
6 terms of a call or maybe with you and Ms. Hardy, that
7 would be good.

8 MR. PORTER: Yeah, that sounds good, we'll
9 set it up.

10 MR. FLORES: Thank you very much. Do you
11 need any other information from me, Leisa?

12 COURT REPORTER: Just your transcript
13 orders. Did you want to order the transcript?

14 MR. FLORES: Yes.

15 COURT REPORTER: And did you need this
16 expedited?

17 MR. FLORES: As quickly as you can get it.
18 I don't know what your schedule is, so...

19 COURT REPORTER: On Friday?

20 MR. FLORES: That's great.

21 COURT REPORTER: Did you want a copy,
22 Mr. Porter?

23 MR. PORTER: You know what, I need to
24 follow up with you on that. I'll be in touch.

25 (The deposition was concluded at 2:33 p.m.)

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**Signature of the witness was not requested
by counsel for the respective parties
hereto.)**

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CERTIFICATE OF NOTARY

STATE OF MICHIGAN)

) SS

COUNTY OF MONROE)

I, LEISA PASTOR, certify that this
deposition was taken before me on the date
hereinbefore set forth; that the foregoing questions
and answers were recorded by me stenographically and
reduced to computer transcription; that this is a
true, full and correct transcript of my stenographic
notes so taken; and that I am not related to, nor of
counsel to, either party nor interested in the event
of this cause.

Leisa Pastor

LEISA PASTOR, CSR-3500, CRR,

Notary Public,

Monroe County, Michigan

My Commission expires: 9/7/27

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